

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

Received

JUN 15 2022

PEDRO ORTIZ ROMERO
Plaintiff

v.
In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

] PROMESA, Kroll Restructuring Administration
] Title III
] No. 17 BK 3283-LTS

] This filing relates to the
[Commonwealth, ERS
[and HTA.
[

**REPLY TO THE FOUR HUNDRED FIFTY-
TIDRD OMNIBUS OBJECTION
(NON-SUBSTANTIVE) OF THE COMMONWEALTH OF
PUERTO RICO, THE EMPLOYEES RETIREMENT
SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO, AND THE
PUERTO RICO HIGHWAYS AND TRANSPORTATION
AUTHORITY TO CLAIMS ASSERTING LIABILITIES
OWED BY ENTITIES THAT ARE NOT TITLE III
DEBTORS. CLAIM #31895. DOCUMENT #. 20778 and
20784.**



990123401147105

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

Comes now, Plaintiff - "Claimant" Pedro Ortiz Romero ("Plaintiff" or "Claimant") and very respectfully represent and pray: if this Honorable Court allows me.:

The Commonwealth of Puerto Rico (the "Commonwealth"), the
Employees Retirement System of the Government of the

Commonwealth of Puerto Rico ("ERS"), and the Puerto Rico Highways and Transportation Authority ("HTA," and together with the Commonwealth and ERS, the "Debtors") by and through the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as the sole Title III representative of the Debtors pursuant to section 31S(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* ("PROMESA"),² file this four hundred fifty-third omnibus objection (the "Four Hundred Fifty-Third Omnibus Objection") seeking to disallow the proofs of claim listed on **Exhibit A**.

INFORMATION

A. The factual background of this reply

1. Plaintiff is informing this Honorable Court that, as of this date, December 14, 2021, he has not found a legal counsel who will represent him in this case for the reasons he mentioned in the Complaint. **See. Exhibit ZF.**
2. The Debtors intend to reject the claim evidence that this plaintiff sent twice (2) to the debtors, but do not mention in any of the three documents

dated May 13 and 20, 2022. What evidence the Debtors refer to according to Annex A sent to this plaintiff dated May 13, 2022 and may 20, 2022.

JURISDICTION

3. The United States District Court for the District of Puerto Rico has subject matter jurisdiction to consider this matter and the relief requested herein pursuant to PROMESA section 306(a).

4. Venue is proper in this district pursuant to PROMESA section 307(a).

Background of case and documents of the Court and Government related to the global pandemic Coronavirus (hereinafter, COVID-19).

The factual background of this case.

History of Claimant.

5. The Commonwealth of Puerto Rico (the "Commonwealth"-Debtors) mailed me three (3) different documents:

6. The first on May 13, 2022 and received by this Plaintiff - Claimant on June 1, 2022, at the post office. **See Exhibit 2022-R1, R2 and R3. Page 1, 2 and 16.**

7. The second on May 13, 2022 and received by this Plaintiff - Claimant on June 1, 2022, at the post office. **See Exhibit 2022-R4, R5 and R6. Page 1, 2 and 7.**

8. The third on May 20, 2022 (see envelope dated and stamped on May 20, 2022) and received by this Plaintiff - Claimant on June 1, 2022, at the post

office. **See Exhibits 2022-R7 and 2022-R8. Page 1.**

9. The three (3) documents mention the following:

Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico . Proof of Claim and supporting documentation only show liability between Claimant and Government Development Bank which is not part of the Title III proceedings.

10. I totally disagree with the "Commonwealth"-Debtors' arguments and decision the "Commonwealth"-Debtors not to pay. For the following reasons:

11. According to the fourteenth amendment. Where he mentions the due process of law". This Plaintiff - Claimant has the right to have his claim addressed. Which is a valid debt before the Law.

12. This Plaintiff - Claimant sent two (2) times evidence to justify his claim.

13. The first, On May 24, 2018 in the USDC-PR I claimed part of the debt owed to me by the GDB. (\$14,558.23) See Exhibits O and P.

14. The second one was requested and I sent by registered mail on July 27, 2022. **See Exhibits 2021-ZZ61, and ZZ62.**

15. The "Commonwealth"-Debtors" through its lawyers on August 9, 2018 (case 18-civ- 01561) requested to the Honorable United States District Court Judge Laura Taylor Swain by means of a motion permission to reorganize the Government Development Bank using the Promise Act. **See Exhibits 2022-R9 and R10. Page 1 and 28.**

16. On November 7, 2018, the Honorable United States District Court Judge Laura Taylor Swain granted her permission. To reorganize the Government

Development Bank, using the Promise Law. **See Exhibits 2022-R11 and R12. Page 1 and 27.**

17. Which means that the Government Development Bank is part of the Promise Act, at the request of the "Commonwealth"-Debtors' and the authorization of the Honorable United States District Court Judge Laura Taylor Swain.

On this i will be arguing later during this response motion'.

Related to the claim, he mentioned the following: Evidence of the claim, related procedures and objection.

18. On May 24, 2018 in the USDC-PR I claimed from the GDB part of the debt that they owe me. (\$ 14, 558.23) See Exhibits O and P.

19. The USDC-PR sent a letter dated May 4, 2021 with a list where they included the claim number, name, ACR procedures and the amount claimed. See Exhibit 2021-ZZ55.

20. The USDC-PR sent a letter dated May 7, 2021 and received by this claimant on May 17, 2021 by mail. Where it mentions the 60 days. See Exhibits 2021-ZZ56 and 2021-ZZ57.

21. As the 60 days passed and no one contacted this claimant about the letter of May 7, 2021. On July 7, 2021, call the telephone numbers that appear in the letter and report it. E. The COMMONWEALTH OF PUERTO RICO ACR PROCESSING CENTER C / O PRIME CLERK, LLC., Sent a

letter dated July 8, 2021 and received by this claimant on July 19, 2021 by mail. Where it mentions that this claimant has 20 days to answer.

22. This claimant will answer you and send you evidence of the documents that were sent to me and those that I obtained. See Exhibits 2021-ZZ58 and 2021-ZZ59.

In addition, he mentioned the following:

23. On April 5, 2018, I filed two charges: one against the Governmental Development Bank for Puerto Rico, Charge No. 515-2018-00239; and another against the Puerto Rico Fiscal Agency and Financial Advisory Authority (FAFAA), EEOC Charge No. 515-2018-00240. Both charges were for age discrimination. See Exhibits A and B.

24. Charge No. 515-2018-00239 against the GDB was answered by a letter, and I refuted it with another letter and evidence on May 14, 2018, where I objected it and rejected its position and arguments.

25. I worked for the Governmental Development Bank for Puerto Rico from May 2000 to March 23, 2018, when I was fired. At that time, Christian Sobrino was its president as well as the chairman of the board for FAFAA (according to newspaper reports). It was he who, through a letter dated March 21, 2018, and delivered on March 23, 2018, by Guillermo

Camba ("Camba"), the GDB's chief operations officer [sic], along with a copy on which I wrote the following: "Received, but not accepted." I -was fired discriminatorily from the GDB. See Exhibit F.

26. Before all of this, I had applied for two positions (7355 and 7358) with the Puerto Rico Fiscal Agency and Financial Advisory Authority (FAFAA). On Wednesday, March 21, 2018, I was given a letter signed by Alejandro Camporeales, the Chief Operations Officer of FAFAA, denying me the positions applied for. In said letter, he mentioned, among other things, the following: "We regret to inform you that you were not the person selected." See Exhibit E.

27. The ADEA provides that it is unlawful for an employer to "refuse to hire or to discharge any individual or otherwise discriminate against (him) with respect to his compensation, terms, conditions , or privileges of employment because of such individual 's age." 29 U.S.C. 623 (a)(l), (d).

Regarding the cases and lawsuits, he mentioned the following:

28. This claimant sued the GDB for discrimination. **See case 18-Civil-1993** and I appeal the case to the First Circuit of Boston. **See case 19-2084 and Exhibit G, 2021-ZZ43 and 2021-ZZ60.**

In addition, this claimant also sued the AAFAF for discrimination.

29. See case 19-Civil-1659. See Exhibit ZY. And I appeal the case to the First Circuit of Boston. See Exhibit ZY and 2021-ZZ53. **See case 21-1592.**

Exhibit 2022-RR. Related to my claim (31895 - of these one hundred (100) days). In the deposition of March 29, 2021, I mentioned it to Attorney Mariela Rexach Rexach, Esq., when she asked me about my vacation claim, which has not yet been paid.

I mention the following, if this Honorable Court allows me.:

History-2

30. The Government Development Bank ("GDB") is a public corporate entity created as a banking institution by Puerto Rico Act No. 17 of September 23, 1948, as amended, 7 L.P.R.A. 551 et seq., and by law acted as the Fiscal Agent to the Commonwealth and to all other governmental entities. Together with the Commonwealth of Puerto Rico, the GDB controlled and directed the issuance of securities by entities other than the Commonwealth and the GDB (which are referred to as the "Related Issuers").

31. On August 9, 2018, subject to the terms and conditions set forth in the Solicitation Statement, dated August 9, 2018 (the "Solicitation Statement"),

GDB and AAFAF commenced the solicitation of votes (the “Solicitation”) seeking creditor approval of the Qualifying Modification under Title VI of PROMESA. **See Exhibits 2022-R9 and R10. Page 1 and 28.**

32. The GDB Debt Recovery Authority (the “Issuer”) is a newly formed statutory public trust and governmental instrumentality of the Commonwealth of Puerto Rico (the “Commonwealth”) created pursuant to the GDB Restructuring Act (as defined herein) enacted by the Legislative Assembly of the Commonwealth (the “Legislative Assembly”) for the purpose of receiving the Transferred Property (as defined herein) from Banco Gubernamental de Fomento para Puerto Rico (Government Development Bank for Puerto Rico, herein “GDB”) and issuing the 7.500% GDB Debt Recovery Authority Bonds (Taxable) due 2040 (the “New Bonds”). The Issuer was created by the GDB Restructuring Act to facilitate the restructuring of certain of GDB’s indebtedness pursuant to a Qualifying Modification under Title VI of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”) (such Qualifying Modification as so certified by the Financial Oversight and Management Board (the “Oversight Board”) under Section 601(g)(2)(A) of PROMESA, the “Qualifying Modification”). The Qualifying Modification was certified by the United

States District Court for the District of Puerto Rico on November 7, 2018 as required under PROMESA. **See Exhibits 2022-R11 and R12. Page 1 and 27.**

33. On November 6, 2018, the court held the hearing to consider the Approval Application and, after considering all arguments, filings, and evidence regarding approval of the Qualifying Modification, approved the Qualifying Modification on the record. On November 7, 2018, the court entered the Findings of Fact, Conclusions of Law, and Order Approving Qualifying Modification for the Government Development Bank for Puerto Rico Pursuant to Section 601(m)(1)(D) of the Puerto Rico Oversight, Management, and Economic Stability Act [ECF No. 270] (the “Approval Order”). **See Exhibits 2022-R11 and R12. Page 1 and 27.**

34. The Constitution of the United States applies to every citizen. The fourteenth amendment included in the Constitution related to the due process of law must be complied with and respected. The Civil process and Local Law must be enforced by applicable law. There must be respect for the Law.

35. The constitutional due process protection is intended to secure the

individual from the arbitrary exercise of the powers of government, unrestrained by the established principles of private rights and distributive justice. Constitution of Puerto Rico, Article II §7, and the Constitution of the United States, Amendment XIV; *Cty. of Sacramento v. Lewis*, 523 U.S. 833, 845, 118 (1998); *Hurtado v. California*, 110 U.S. 516, 527 (1884). “The touchstone of due process is protection of the individual against arbitrary action of government.” *Wolff v. McDonnell*, 418 U.S. 539, 558 (1974). It prevents government officials from abusing their power, or employing it as an instrument of oppression. Abusive executive action and egregious official conduct constitutes a substantive due process violation. *Cty. of Sacramento*, p. 846.

36 Moreover, The due process clause of the fourteenth amendment to the United States Constitution prohibit states from “depriving any person of life, liberty, or property without due process of law”.

37. In addition, I strongly disagree with Jay Harriman's Statement in Support of the four hundred fifty-third Omnibus Objection of the Commonwealth of Puerto Rico and Debtors ("Commonwealth"-Debtors).

WHEREFORE, this plaintiff respectfully requests the following of this

Honorable Court, if this Honorable Court allows me:

Everything requested and detailed in this motion. Furthermore, this Plaintiff respectfully request to the Honorable Court, the following :

A. This plaintiff respectfully asks this court not to cancel my claim.

Requested by debtors in the four hundred fifty-third Omnibus Objection of the Commonwealth of Puerto Rico and Debtors ("Commonwealth"-Debtors).

B. Do not order that this plaintiff's Claim be Rejected and be hereby disavowed in its entirety. Because my claim is valid, and this plaintiff sent the evidence twice (2) to the debtors.

C. Do not order or authorize Kroll to cancel this plaintiff's claim, or designate them as suppressed to be rejected from the official register of claims under Title III Cases; or authorize the defendants or any other person or entity to cancel my claim. Moreover, The due process clause of the fourteenth amendment to the United States Constitution prohibit states from "depriving any person of life, liberty, or property without due process of law". This Plaintiff - Claimant has the right to have his claim addressed.

Which is a valid debt before the Law.

D. Order the "Commonwealth"-Debtors' to have all the information

regarding this case sent to this Plaintiff - Claimant by mail. The mail is constitutional. (It is one of the few Government Agencies Explicitly Authorized by the United States Constitution).

E. To be able to safeguard the rights of all under the Constitution of the United States. Order that this Court retain its jurisdiction to hear and determine all matters arising out of or relating to the implementation, interpretation or enforcement of future Orders.

RESERVATION OF RIGHTS

In this Response to the Four Hundred and Fifty-Three Omnibus Objection of the Commonwealth of Puerto Rico and Debtors ("Commonwealth"-Debtors). This plaintiff respectfully mentions and clarifies that he is not reviving any of the rights that the United States Constitution grants him.

Reply to the four hundred fifty-third Omnibus Objection of the Commonwealth of Puerto Rico and Debtors ("Commonwealth"-Debtors).

Therefore, this plaintiff respectfully requests that **the motion of May 13, 2022 and Annex D** sent by the Debtors be rejected. Because my claim is valid, and this plaintiff sent the evidence two times to the debtors. 1)
Respectfully requests that the remedy requested by the Debtors be rejected.

Moreover, The due process clause of the fourteenth amendment to the United States Constitution prohibit states from "depriving any person of life, liberty, or property without due process of law". This Plaintiff - Claimant has the right to have his claim addressed. Which is a valid debt before the Law. 2) Furthermore, for all the reasons mentioned above and the documentation presented in this Reply.3) In addition, grant this Plaintiff - Claimant any other remedies deemed fair.

Coronavirus (hereinafter, COVID-19) global pandemic.

On January 21, 2021, the President of the United States of America, the Honorable Joe Biden, has signed several orders in light of ongoing public health issues related to COVID-19. See, the website of the Gov. White House.

SUPREME COURT OF THE UNITED STATES has signed several orders in light of ongoing public health issues related to COVID-19. See, the website of the SUPREME COURT.

The United States Court of Appeals for the First Circuit has signed several orders in light of ongoing public health issues related to COVID-19. See the website of the United States Court of Appeals for the First Circuit.

The Governor of Puerto Rico, Hon. Pedro R. Pierluisi, has signed several orders in light of ongoing public health issues related to COVID-19. See, the website of the Puerto Rico State Department. .

The United States Court for the District of Puerto Rico has signed several orders in light of ongoing public health issues related to COVID-19. See the website of the United States Court for the District of Puerto Rico . Also, see the following:

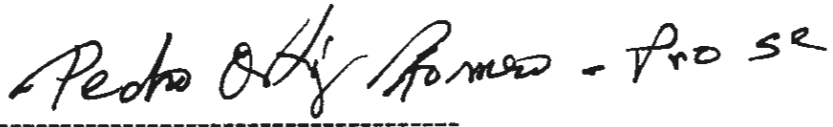
On March 22, 2022, related to the outbreak of the COVID- 19, Raul M. Arias Marxuach Chief, United States District Judge signed one (1) Order until Wednesday , June 22, 2022: 1. No. 20-088. **See, the website of the USDC-PR.**

Respectfully submitted.

Date: In San Juan, Puerto Rico, on this, the 11th day of June 2022.

I hereby certify that a true and accurate copy of this motion will be mailed

to Counsel for the Oversight Board, Proskauer Rose LLP, Eleven Times
Square, New York, New York 10036-8299. And to Counsel for the
Creditors' Committee, Paul Hastings LLP 200 Park Avenue, New York,
New York 10166.


Your Signature: -----

Name typed or printed: Pedro Ortiz Romero – Pro se

Address: PO Box 190987 SAN JUAN, PR 00919-0987

Telephone Number: 787-439-3156

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of this Motion

It will be mailed to the following counsel by Priority Mail :

**Counsel for the Oversight Board
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Attn: Martin J. Bienenstock,
Brian S. Rosen
Tel- (212) 969-3000
Fax-(212) 969-2900**

Counsel for the Oversight Board


Your Signature: _____

Name typed or printed: Pedro Ortiz Romero – Pro Se

Address: PO Box 190987 SAN JUAN, PR 00919-0987

Telephone Number: 787-439-3156

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of this Motion

It will be mailed to the following counsel by Priority Mail :

**Counsel for the Creditors' Committee
Paul Hastings LLP
200 Park Avenue, New York,
New York 10166
Attn: Luc A. Despins,
James Bliss, James Worthington, G.
Alexander Bongartz**

Counsel for the Creditors' Committee

Your Signature: -----

Pedro Ortiz Romero - Pro Se

Name typed or printed: Pedro Ortiz Romero – Pro Se

Address: PO Box 190987 SAN JUAN, PR 00919-0987

Telephone Number: 787-439-3156

12. Defendant Alejandro Camporeales is the Chief Operations Officer of AAFAF. Plaintiff is suing Alejandro Camporeales in his official capacity.

III

FACTS

13. Plaintiff is filing this Complaint as a pro se suitor.

Plaintiff (Ortiz) can pay a reasonable rate (\$100.00 to \$150.00 per hour) for a legal counsel. The problem is that Plaintiff has been searching for a legal counsel for months and nobody wants to take the case.

The reasons Plaintiff has been given include that they do not take or work on employment cases, they only take corporation cases, they have some kind of conflict, or they do not work on cases related to government agencies. These are among several reasons they have mentioned.

14. Plaintiff Pedro Ortiz Romero is a 59-year-old accountant with three university titles, in addition to more than 20 years of accounting experience.

15. Plaintiff worked for the Government Development Bank for Puerto Rico from May 2000 to 03/23/2018, when he was dismissed. Its President at the time was Christian Sobrino, who was also the Chairman of the AAFAF Board (according to newspaper reports), and he was the one who, through a letter dated 03/21/2018 (delivered on 03/23/2018 by Guillermo Camba, GDB's Chief Operations Officer, along with a copy on which Plaintiff wrote the following: "Received but not accepted"), discriminatorily dismissed Plaintiff from GDB. See Exhibit F.

16. In relation to the issue with GDB, Plaintiff filed a complaint for discrimination. The case number is 18-cv-0993. See Exhibit G, first page.

17. Through the website of defendant AAFAF, Plaintiff Pedro Ortiz Romero applied for two positions (7355 and 7358) at the P.R. Fiscal Agency and Financial Advisory Authority, having its principal place of correspondence at PO Box 42001, San Juan, Puerto Rico 00919.

18. Plaintiff was called for an interview at AAFAF in relation to the positions (7355 and 7358) to which Plaintiff herein applied. The interview was held in the same building where GDB was then located and where Plaintiff herein was working at the time before he was discriminatorily dismissed.

Case:17-03283-LTS Doc#:20784 Filed:05/13/22 Entered:05/13/22 19:34:44 Desc: Main Document Page 1 of 22

SRF 61490

Hearing Date: June 29, 2022 at 9:30AM (Atlantic Standard Time)
Response Deadline: June 13, 2022 at 4:00PM (Atlantic Standard Time)

PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO
TO DETERMINE WHETHER THE OBJECTION AFFECTS YOUR CLAIM(S).

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth, ERS and
HTA.

**FOUR HUNDRED FIFTY-THIRD OMNIBUS OBJECTION
(NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO, AND THE PUERTO RICO HIGHWAYS
AND TRANSPORTATION AUTHORITY TO CLAIMS ASSERTING LIABILITIES
OWED BY ENTITIES THAT ARE NOT TITLE III DEBTORS**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), and the Puerto Rico Highways and Transportation Authority (“HTA,” and together with the Commonwealth and ERS, the “Debtors”) by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² file this four hundred fifty-third omnibus objection (the “Four Hundred Fifty-Third Omnibus Objection”) seeking to disallow the proofs of claim listed on Exhibit A hereto, each of which assert liabilities associated with entities that are not Title III debtors, but which fail to comply with the applicable rules by not providing a basis for purporting to assert a claim against the Commonwealth, ERS, HTA, or any other Title III Debtor. In support of the Four Hundred Fifty-Third Omnibus Objection, the Debtors respectfully represent as follows:

JURISDICTION

1. The United States District Court for the District of Puerto Rico has subject matter jurisdiction to consider this matter and the relief requested herein pursuant to PROMESA section 306(a).

2. Venue is proper in this district pursuant to PROMESA section 307(a).

BACKGROUND

A. The Bar Date Orders

3. On May 3, 2017, the Oversight Board issued a restructuring certification pursuant to PROMESA sections 104(j) and 206 and filed a voluntary petition for relief for the

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Exhibit. 2022-R-3

Case:17-03283-LTS Doc#:20784-1 Filed:05/13/22 Entered:05/13/22 19:34:44 Desc:

Exhibit A (English) Page 17 of 26
Four Hundred Fifty-Third Omnibus Objection

Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
61	NIEVES RODRIGUEZ, LOURDES AVE STGO ANDRODES 302 MAGUEYES PARK NUEVAS PONCE, PR 00728	06/29/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	148896-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Employees Retirement System of the Government of the Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Regional Hospital - Ponce which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
62	ORTEGA ASENSIO, NEREIDA URB. LOS LLANOS, 116 CALLE CEDRO CIALES, PR 00638-9682	07/06/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	159334-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Correctional Health Services which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
63	ORTIZ ROMERO, PEDRO PO BOX 190987 SAN JUAN, PR 00918-0987	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	31895	\$14,558.23
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Government Development Bank which is not part of the Title III proceedings.						
64	ORTIZ ROSARIO, ELDA URB SAN AUGUSTO B 1: CALLE HACIENDA LA ELISA GUAYANILLA, PR 00656	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	124273-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Correctional Health Services which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						

*Indicates claim contains unliquidated and/or undetermined amounts

SRF 61497

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF REMOVAL OF CERTAIN CLAIMS FROM ADMINISTRATIVE CLAIMS
RECONCILIATION AND ALTERNATIVE DISPUTE RESOLUTION**

To the Honorable United States District Judge Laura Taylor Swain:

1. On March 12, 2020, the Court entered the *Order (A) Authorizing Administrative Reconciliation Of Claims, (B) Approving Additional Form Of Notice, and (C) Granting Related Relief* [ECF No. 12274] (the “ACR Order”), authorizing the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Electric Power Authority (“PREPA”), and the Puerto Rico Public Buildings Authority

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567- LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK- 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

(“PBA,” and together with the Commonwealth, HTA, ERS, and PREPA, the “Debtors”) to resolve certain Pension/Retiree Claims, Tax Refund Claims, Public Employee Claims, and Grievance Claims (each as defined in the ACR Order) utilizing the Debtors’ existing administrative reconciliation processes (“Administrative Claims Reconciliation”).

2. Pursuant to the ACR Order, the Debtors have filed twenty-three notices transferring claims into Administrative Claims Reconciliation (as defined in the ACR Order), (collectively, the “ACR Transfer Notices”), and have transferred approximately 44,704 claims (collectively, the “ACR Designated Claims”), into Administrative Claims Reconciliation.

3. On April 1, 2020, this Court entered the *Order (A) Authorizing Alternative Dispute Resolution Procedures, (B) Approving Additional Form of Notice, and (C) Granting Related Relief* [ECF No. 12576] (the “ADR Order”). The ADR Order authorized the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Electric Power Authority (“PREPA”), and the Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth, HTA, ERS, and PREPA, the “Debtors”) to resolve general unsecured claims using the procedures approved by the court in the ADR Order (“ADR Procedures”).

4. Pursuant to the ADR Order, the Debtors have filed twenty-three notices transferring claims into the ADR Procedures (as defined in the ADR Order), (collectively, the “ADR Notices”), and have transferred approximately 960 claims (collectively, the “ADR Designated Claims”) into the ADR Procedures.

5. In light of information received from the claimants following the transfer of claims, the Debtors have determined that certain ACR Designated Claims and ADR Designated Claims will be most efficiently resolved via omnibus objections. Accordingly, the Debtors hereby remove from

Claim	Claimant	Debtor	Total Filed
130614	NIEVES ALICEA, LUCIA	Commonwealth of Puerto Rico	\$ 5,802
112768-1	NIEVES HERNANDEZ, HILDA	Commonwealth of Puerto Rico	\$ 5,000
121044-1	NIEVES HERNANDEZ, HILDA	Commonwealth of Puerto Rico	\$ 3,000
174562-1	NIEVES LUCIANO, ANA M	Commonwealth of Puerto Rico	\$ -
106406	NIEVES RIVAS, MARGARITA	Commonwealth of Puerto Rico	\$ -
148896-1	NIEVES RODRIGUEZ, LOURDES	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$ -
144662	NOBLE TORRES, IVONNE	Commonwealth of Puerto Rico	\$ -
159494	NOBLE TORRES, IVONNE	Commonwealth of Puerto Rico	\$ -
138534	NUNEZ CRUZ, LUZ ZENaida	Commonwealth of Puerto Rico	\$ -
139632	OCASIO ROSARIO, JOSEFA	Commonwealth of Puerto Rico	\$ -
135145	OCASIO ROSARIO, JOSEFA	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$ -
111590	OQUENDO, ENEIDA MARIN	Commonwealth of Puerto Rico	\$ 25,000
159334-1	ORTEGA ASECIO, NEREIDA	Commonwealth of Puerto Rico	\$ -
144663	ORTIZ APONTE, ADA M.	Commonwealth of Puerto Rico	\$ -
162765	ORTIZ APONTE, IRIS DALILA	Commonwealth of Puerto Rico	\$ -
95454	ORTIZ APONTE, IRIS DALILA	Commonwealth of Puerto Rico	\$ -
102480	ORTIZ APONTE, IRIS DALILA	Commonwealth of Puerto Rico	\$ -
103293	ORTIZ APONTE, IRIS DALILA	Commonwealth of Puerto Rico	\$ -
104132	ORTIZ APONTE, IRIS DALILA	Commonwealth of Puerto Rico	\$ -
162761	ORTIZ APONTE, IRIS DALILA	Commonwealth of Puerto Rico	\$ -
120249	ORTIZ ARROYO, MANUEL ANTONIO	Commonwealth of Puerto Rico	\$ -
123731	ORTIZ MARTINEZ, JOSEFA DEL C	Commonwealth of Puerto Rico	\$ 18,000
111270	ORTIZ MATOS, NANCY I.	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$ -
177175	ORTIZ MATOS, NANCY I.	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$ 75,000
178113	ORTIZ MORALES, MILAGROS	Commonwealth of Puerto Rico	\$ 2,000
125856	ORTIZ OLIVERAS, MYRIAM C	Commonwealth of Puerto Rico	\$ -
144774	ORTIZ RIVERA, ADA IVETTE	Commonwealth of Puerto Rico	\$ -
120123	ORTIZ RIVERA, ADA IVETTE	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$ -
31895	ORTIZ ROMERO, PEDRO	Commonwealth of Puerto Rico	\$ 14,558
124273-1	ORTIZ ROSARIO, ELDA	Commonwealth of Puerto Rico	\$ -
173614	ORTIZ SANTIAGO, ADA IRMA	Puerto Rico Public Buildings Authority (PBA)	\$ 100,000
131761-1	OSORIO CRUZ, BENITA	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$ -
176832	OSORIO PLAZA, DIADINA	Commonwealth of Puerto Rico	\$ 15,000
179176-1	OTERO CARRION, BENITO	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$ -
111740-1	OTERO DIAZ, MARISOL	Commonwealth of Puerto Rico	\$ -
94950-1	PADILLA AQUINO, GLADYS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$ -
173029-1	PAGAN MEDINA, MINERVA	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$ -

**IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS
ARE SEEKING TO DISALLOW YOUR CLAIM FOR THE REASON LISTED BELOW.**

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
ORTIZ ROMERO, PEDRO	31895	5/25/2018	Commonwealth of Puerto Rico	\$14,558.23
Treatment:	Claim to be Disallowed			
Reason:	Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Government Development Bank which is not part of the Title III proceedings.			

**SI SU RECLAMO ESTÁ INCLUIDO AQUÍ, UNO O MÁS DE LOS DEUDORES
SOLICITAN QUE SU RECLAMO SEA RECHAZADO POR LA RAZÓN INDICADA AQUÍ ABAJO.**

NOMBRE	N.º DE RECLAMACIÓN	FECHA DE PRESENTACIÓN	DEUDOR	MONTO DE LA RECLAMACIÓN ALEGADA
ORTIZ ROMERO, PEDRO	31895	5/25/2018	Commonwealth of Puerto Rico	\$14,558.23
Tratamiento:	Reclamo a ser desestimado			
Base para:	La Evidencia de Reclamo no presenta fundamentos para invocar un reclamo contra el Estado Libre Asociado de Puerto Rico. La Evidencia de Reclamo y la documentación de respaldo solo indican una obligación entre el Demandante y el Banco Gubernamental de Fomento, que no forma parte de los procedimientos iniciados al amparo del Título III.			

Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.ra.kroll.com/puertorico/>. If you have questions, please contact Kroll Restructuring Administration LLC (formerly known as Prime Clerk LLC) at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).

Copias de la Objeción global, y todos los escritos radicados en el marco de las causas conforme al Título III, están disponibles, de manera gratuita, en <https://cases.ra.kroll.com/puertorico/>. Si tiene alguna pregunta, comuníquese con Kroll Restructuring Administración LLC (anteriormente conocido como Prime Clerk LLC) llamando al (844) 822-9231 (número gratuito para Estados Unidos y Puerto Rico) o (646) 486-7944 (para llamadas desde el extranjero), disponible entre las 10:00 a.m. y las 07:00 p.m. (AST) (hablamos español).

Prime Clerk, LLC
Grand Central Station
PO Box 4850
New York, NY 10163-4850

quadrant FIRST CLASS MAIL

05/20/2022
US POSTAGE \$000.53⁹



ZIP 38109
041M12254356

LEGAL NOTICE ENCLOSED. DIRECT TO ATTENTION OF ADDRESSEE OR PRESIDENT/GENERAL COUNSEL.

0091300987

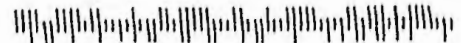


Exhibit 2022-R-8

Exhibit. 2022-R-9

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

THE GOVERNMENT DEVELOPMENT BANK
FOR PUERTO RICO,

Applicant.

PROMESA

Title VI

Case No. 18-1561

APPLICATION OF THE GOVERNMENT DEVELOPMENT BANK FOR PUERTO RICO AND THE PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY, PURSUANT TO SECTION 601(M)(1)(D) OF THE PUERTO RICO OVERSIGHT, MANAGEMENT, AND ECONOMIC STABILITY ACT, FOR APPROVAL OF THE QUALIFYING MODIFICATION FOR GDB

The Government Development Bank for Puerto Rico (“GDB”) and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), pursuant to section 601(m)(1)(D) of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”),¹ hereby file this Application (the “**Application**”) for approval of the Qualifying Modification (as defined below) for GDB. In support of the Application, GDB and AAFAF state as follows:

PRELIMINARY STATEMENT

I. The Application represents an important step in Puerto Rico’s overall financial restructuring: the government of Puerto Rico has reached consensus on the terms of a debt modification of a financially troubled public corporation under the creditor collective action procedures of PROMESA Title VI. Unlike PROMESA Title III, Title VI is premised on voluntary negotiations between a government debtor and its creditors with the Court having a limited supervisory role. In GDB’s case, the Qualifying Modification, which is the result of more than a year of complex negotiations among various constituents, is supported by creditors holding a majority of the \$4.5 billion in claims to be modified by Court order, as reflected by the

¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in PROMESA.

Exhibit. 2022-R-10

CONCLUSION

For the reasons set forth above, along with the other evidence to be submitted to the Court following the Voting Deadline and prior to the Approval Hearing, GDB and AAFAF respectfully request that this Court approve the Qualifying Modification as fully satisfying all of the applicable requirements of PROMESA section 601 by entering an order approving the Qualifying Modification and granting such other and further relief as is just and proper.

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

THE GOVERNMENT DEVELOPMENT BANK
FOR PUERTO RICO,

Applicant.

PROMESA

Title VI

Case No. 18-1561 (LTS)

**FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER
APPROVING QUALIFYING MODIFICATION FOR THE
GOVERNMENT DEVELOPMENT BANK FOR PUERTO RICO
PURSUANT TO SECTION 601(m)(1)(D) OF THE PUERTO RICO
OVERSIGHT, MANAGEMENT, AND ECONOMIC STABILITY ACT**

The Government Development Bank for Puerto Rico (the “GDB”) and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) having:¹

- a. on August 9, 2018, commenced a solicitation of votes on the Qualifying Modification for GDB pursuant to the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”) section 601 (the “Solicitation”) by delivering (i) a copy of the Solicitation Statement, dated August 9, 2018 (the “Solicitation Statement”) including the Preliminary Offering Memorandum, and (ii) one or more ballots, as applicable (the “Ballot(s)”, together with the Solicitation Statement, the “Solicitation Package”), to all Eligible Voters (as defined herein), as evidenced by, among other things, the Affidavit of Solicitation [ECF No. 155] (the “Solicitation Affidavit”) filed by Epiq Corporate Restructuring (the “Information Agent”) on September 20, 2018;
- b. caused notice of the Solicitation to be published in (i) El Nuevo Día (in Spanish); (ii) Caribbean Business (in English); (iii) El Diario and El Nuevo Herald (in Spanish); (iv) The Bond Buyer (in English); and (v) the Wall Street Journal (in English), as evidenced by, among other things, the Affidavit of Publication [ECF No. 198] (the “Solicitation Publication Affidavit”) filed by the Information Agent on October 18, 2018;
- c. filed, on August 10, 2018 (the “Title VI Application Date”), the *Application of the Government Development Bank for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority, Pursuant to Section 601(m)(1)(D) of the Puerto Rico Oversight, Management, and Economic Stability Act, for*

¹ Unless otherwise noted herein, capitalized terms not defined in these findings of fact, conclusions of law, and order (collectively, this “Approval Order” or this “Order”) have the meanings ascribed to them in the Approval Application (as defined herein).

this Approval Order subject to the satisfaction of the conditions precedent to consummation set forth in the Qualifying Modification.

N. Retention of Jurisdiction.

43. To the fullest extent permitted by law, and notwithstanding the entry of this Order or the occurrence of the Closing Date, this Court shall retain exclusive jurisdiction over any matter arising under the Qualifying Modification or this Approval Order.

O. Final Order.

44. This Order is a final order and the period in which an appeal must be filed shall commence upon entry hereof.

P. Waiver of Stay.

45. Notwithstanding Rule 62 of the Federal Rules of Civil Procedures or otherwise, this Order shall be effective and enforceable immediately upon entry. GDB, AAFAF and the Recovery Authority are authorized to consummate the Qualifying Modification at any time after the entry of this Approval Order.

SO ORDERED.

Dated: November 7, 2018

/s/ Laura Taylor Swain
Laura Taylor Swain
United States District Judge

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT**

No. 21-1592

PEDRO ORTIZ ROMERO,

Plaintiff - Appellant,

v.

PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY
AUTHORITY (FAFAA);

ITS PRESIDENT; CHRISTIAN SOBRINO VEGA; ITS CHIEF
OPERATIONS OFFICER, ALEJANDRO CAMPOREALES,
Defendants - Appellees.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

[Hon. William G. Young, U.S. District Judge]

REPLY TO THE BRIEF OF THE DEFENDANTS-APPELLES. AND
APPENDIX TABLE – VOLUME I (Pgs. A.1-A.29) and VOLUME II
(Pgs. A.30-A.352-357)

Before

Circuit Judges.

Pedro Ortiz Romero – (Pro se.)

P.O. Box 190987 SAN JUAN, P.R. 00919-0987

Telephone Number: 787-439-3156

Plaintiff - Appellant

December 14, 2021

TO THE HONORABLE COURT:

Comes now, Plaintiff - Appellant Pedro Ortiz Romero("Plaintiff" or "Appellant") and very respectfully represent and pray:

INFORMATION

A. The factual background of this appeal

1. Plaintiff is informing this Honorable Court that, as of this date, December 14, 2021, he has not found a legal counsel who will represent him in this case for the reasons he mentioned in the Complaint. See. Exhibit Dkt. 1. (A.88; A.86-96).
2. This reply is filed under Fed. R. App. P. 31 and 1st Cir. R. 31.0.
3. On September 20, 2021, October 15, 2021 and October 19, 2021, this Plaintiff-Appellant, presented a Brief and Appendix.
4. On November 23, 2021, the Defendants-Appellees, sent a copy of a Brief and a Supplementary Appendix. These Arrived at Post Office SAN JUAN, PR 00918 on November 24, 2021. These documents were received by this



1 AZA LAS MERTIS
525 AVE FD ROOSEVELT STE 111
SAN JUAN, PR 00918-9997
(800)275-8777

07/27/2021 07:55 PM

Product	Qty	Unit Price	Price
PM Express 2-Day	1		\$26.35
Flat Rate Env			
Brooklyn, NY 11232			
Flat Rate			
Signature Waiver			
Scheduled Delivery Date			
Thu 07/29/2021 06:00 PM			
Money Back Guarantee			
Tracking #:			
EJ672167029US			
Insurance			\$0.00
Up to \$100.00 included			
Total			\$26.35
Grand Total:			\$26.35
Cash			\$40.00
Change			-\$13.65

USPS is experiencing unprecedented volume increases and limited employee availability due to the impacts of COVID-19. We appreciate your patience.

The timeliness of service to or from destinations outside the contiguous US may be affected by the limited availability of transportation.

Save this receipt as evidence of insurance. For information on filing an insurance claim go to <https://www.usps.com/help/claims.htm>

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

Preview your Mail
Track your Packages
Sign up for FREE @
<https://infomedelivery.usps.com>

All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

Tell us about your experience
Go to: <https://postalexperience.com> Pos
or scan this code with your mobile device.



or call 1-800-410-7420.

**PEDRO ORTIZ ROMERO
P.O.BOX 190987
SAN JUAN, PR. 00919-0987**

Exhibit. 2021-ZZ61

July 27, 2021

**COMMONWEALTH OF PUERTO RICO
ACR PROCESSING CENTER
C/O PRIME CLERK, LLC.
850 3rd AVENUE, SUITE 412
BROOKLYN, NY 11232**

**Asunto: Pedro Ortiz Romero
Claim No. : 31895**

Dear AAFAF - (G.OF PR).

Related to the claim, he mentioned the following:

- A. On May 24, 2018 in the USDC-PR I claimed from the GDB part of the debt that they owe me. (\$ 14, 558.23) See Exhibits O and P.
- B. The USDC-PR sent a letter dated May 4, 2021 with a list where they included the claim number, name, ACR procedures and the amount claimed. See Exhibit 2021-ZZ55.
- C. The USDC-PR sent a letter dated May 7, 2021 and received by this

claimant on May 17, 2021 by mail. Where it mentions the 60 days. See Exhibits 2021-ZZ56 and 2021-ZZ57.

D. As the 60 days passed and no one contacted this claimant about the letter of May 7, 2021. On July 7, 2021, call the telephone numbers that appear in the letter and report it. E. The COMMONWEALTH OF PUERTO RICO ACR PROCESSING CENTER C / O PRIME CLERK, LLC., Sent a letter dated July 8, 2021 and received by this claimant on July 19, 2021 by mail. Where it mentions that this claimant has 20 days to answer.

F. This claimant will answer you and send you evidence of the documents that were sent to me and those that I obtained. See Exhibits 2021-ZZ58 and 2021-ZZ59.

In addition, he mentioned the following:

1. On April 5, 2018, I filed two charges: one against the Governmental Development Bank for Puerto Rico, Charge No. 515-2018-00239; and another against the Puerto Rico Fiscal Agency and Financial Advisory Authority (FAFAA), EEOC Charge No. 515-2018-00240. Both charges were for age discrimination. See Exhibits A and B.

2. Charge No. 515-2018-00239 against the GDB was answered by a letter, and I refuted it with another letter and evidence on May 14, 2018, where I objected it and rejected its position and arguments.
3. I worked for the Governmental Development Bank for Puerto Rico from May 2000 to March 23, 2018, when I was fired. At that time, Christian Sobrino was its president as well as the chairman of the board for FAFAA (according to newspaper reports). It was he who, through a letter dated March 21, 2018, and delivered on March 23, 2018, by Guillermo Camba ("Camba"), the GDB's chief operations officer [sic], along with a copy on which I wrote the following: "Received, but not accepted." I -was fired discriminatorily from the GDB. See Exhibit F.
4. On March 23, 2018, the following employees were left in the Pre-intervention Department:
5. [sic] Nine (9) employees, of which I, the plaintiff (Pedro Ortiz Romero), was the oldest at 58 years of age and several months. Five (5) accepted the incentive; two (2) were accepted into FAFAA; and one (1) I'm not sure if she was relocated to another agency; and I, the plaintiff (Ortiz), who was up in age at 58 years and several months at

that time, was fired on the morning of March 23, 2018.

6. Before all of this, I had applied for two positions (7355 and 7358) with the Puerto Rico Fiscal Agency and Financial Advisory Authority (FAFAA). On Wednesday, March 21, 2018, I was given a letter signed by Alejandro Camporeales, the Chief Operations Officer of FAFAA, denying me the positions applied for. In said letter, he mentioned, among other things, the following: "We regret to inform you that you were not the person selected." See Exhibit E.
7. In addition to being the oldest employee in the Pre-intervention Department, I was also the employee with the most experience in the job that I did, which was to review contracts, invoices, service orders, and other responsibilities.
8. The work I did as a public servant for the GDB was a very important, ongoing job (a specialized job) that could not be left undone . It had to be done. That was my job (among other responsibilities) with the GDB from 2000 to March 23, 2018. That was the job I was doing when I was fired on March 23, 2018.
9. I asked Guillermo Camba (at the meeting) who was going to work with the invoices and contracts. He said someone else would have to

take care of it.

10. On March 23, 2018, the GDB was left with employees younger than me and with less experience than me. When I went up (March 26, 2018) to Floor P to collect some of my belongings, there were employees working (Jessica/Tatiana). Jessica said that she wasn't staying (all of her staff was fired; she could not work like that, she said). She also said that Maria Vazquez (Vazquez) was called in to work.

11. The ADEA provides that it is unlawful for an employer to "refuse to hire or to discharge any individual or otherwise discriminate against (him) with respect to his compensation, terms, conditions , or privileges of employment because of such individual 's age." 29 U.S.C. 623 (a)(1), (d).

12. When I, the plaintiff (Ortiz), was fired from the GDB on March 23, 2018, I was 58 years old at the time.

13. I have the following college degrees (three):

14. An Associate degree in Accounting.

15. A Bachelor's degree in Accounting.

16. A Bachelor's degree in computer programming.
17. On Friday, March 23, 2018, I was fired from the Governmental Development Bank for Puerto Rico through a letter dated March 21, 2018, and submitted on March 23, 2018, by Guillermo Camba ("Camba"), GDB's Chief Operations Officer, along with a copy, on which I wrote the following: "Received, but not accepted."
18. When I went up to Floor P (March 26, 2018) to pick up some of my belongings, there were employees working. Jessica, the Pre-intervention supervisor, said that Maria Vazquez (Vazquez) was called to work.
19. Tatiana Delgado said that they promoted her to accounting. She asked me about some invoices that I was working on and I explained to her how I worked on them. See. Acevedo Parrilla v. Novartis EX Lax Inc., No. 10-2276 (1st Cir. 2012). See. Soto Feliciano v. Villa Cofresi Hotels, Inc. No. 13-2296 (1st Cir. 2015). See. Magda I. Alvarez v. Eric K. Shinseki. No. 12-1022 (GAG).
20. The GDB made different offers to its employees for their job

position, based on years of service. Some were offered one week, others two weeks, or three weeks plus six months of wages, if they qualified, among other things. That was their offer that was entirely verbal, because I was never given anything in writing.

21. In other words, they were buying the positions.

22. In my case, I, the plaintiff, did not accept their offer and, in retaliation and discriminatorily, I was fired, and they kept my job position and gave it to someone else.

23. The work that I, the complainant, did was a specialized and ongoing job; it had to be done and it could not be left undone. By that I mean I, the plaintiff, worked with the following: contracts, service orders, PROMESA contracts, PROMESA invoices, and other jobs. See Exhibits G.

Statement of Relief

When the GDB fired me on the morning of Friday, March 23, 2018, I was not allowed to submit my offer, and by suing them, I now have the opportunity to submit it. Therefore, my offer is as follows:

I worked for the GDB for 17 years and 10 months (from May 2000 to March

23, 2018).

My monthly salary was \$3,177.30 See

Exhibit P. At 12 months, the total was

\$38,127.60

\$38,127.60 * 17.833333 = \$679,942.19. This is my offer (it is the price of
my job position for 17 years and 10 months).

I also ask payment from the GDB for the following:

My sixty-three (63) days of vacation that total \$9,237.38, which, according to the letter dated March 21, 2018, and submitted on March 23, 2018, mentions that it would be paid to me. However, as of today, December 12, 2018, I have not been paid. See Exhibits O and P.

My one hundred (100) days of sick leave that total \$14,662.50, which, when I asked on the same day that I was fired in front of those who were at the tables, Mr. Camba said it was not one hundred (100) days; it was ninety-nine (99) days. See Exhibits O and P.

Summary:

\$679,942.19 my offer

\$9,237.38 my vacation leave

\$14,662.50 my days of sick leave

\$703,832.07 Total demand

Of these one hundred (100) days, I claimed ninety-one point six four zero (91.640) days in federal court because there was a deadline (a cut-off date). In court, I was given a claim number and then, the updated proof of claim arrived by mail (I was at the post office on December 10, 2018), in an envelope sent by "Prime Clerk LLC", 830 Third Avenue, New York, NY 10022. See Exhibits O and P.

Regarding the cases and lawsuits, he mentioned the following:

This claimant sued the GDB for discrimination. See case 18-Civil-1993 and I appeal the case to the First Circuit of Boston. See case 19-2084 and Exhibit G, 2021-ZZ43 and 2021-ZZ60.

In addition, this claimant also sued the AAFAF for discrimination. See case 19-Civil-1659. See Exhibit ZY. And I appeal the case to the First

Circuit of Boston See Exhibit ZY and 2021-ZZ53. Related to my claim (31895 - of these one hundred (100) days). In the deposition of March 29, 2021, I mentioned it to Attorney Mariela Rexach Rexach, Esq., when she asked me about my vacation claim, which has not yet been paid.

Related to the deposition I mention the following:

This claimant requested, in several motions, Delete (Cancel) the deposition of March 29, 2021 and all materials in the registry, including the deposition, documents, electronically stored information, recordings, video affidavits or declarations, stipulations (including those made for the purposes of the deposition only), admissions, answers to the interrogation or other materials according to rules 28 and 30 of the Federal Rules of Civil Procedure, for the following, irregularities that occurred in the oral exam in the way of taking statements, in the form of questions, in the oath, affirmation and in the conduct of the parties (understand, Lcda Mariela Recach and Mr. Camba). **See Exhibits 2021-ZZ8, 2021-ZZ11, 2021-ZZ14, 2021-ZZ16 and 2021-19.**

RESPECTFULLY SUBMITTED.

Date: In San Juan, Puerto Rico, on this, the 27th day of July 2021.

Your Signature: 

Name typed or printed: Pedro Ortiz Romero

Address: PO Box 190987 SAN JUAN, PR 00919-0987

Telephone Number: 787-439-3156

Creditor Name: ORTIZ ROMERO, PEDRO

(1) Nombre Completo	PEDRO,ORTIZ ROMERO.
(2) Numero de telefono	787-439-3156.
(3) Numero de empleado	POR-3500
(4) Agenda para la cual trabaja(6) y fecha. Si usted fue empleado en mas de una agenda, por favor identifique la agenda o agendas relacionadas a su reclamación y las fechas en que estuvo empleado por cada agenda.	Governmental Development Bank for Puerto Rico, (GDB). he GDB from 2000 to March 23, 2018.
(5) Correo electrónico	xxxxxxxxxxxxx.
(6) Numero de seguro social (ultimos cuatro dfgitos)	XXX-XX-5390.
(7) Numero de caso administrative o judicial, si aplica.	Incluya numero de case administrative y/o judicial, si alguno, que haya radicado y que este directamente relacionar los beneficios reclamados en la Evidencia de Reclamación (<i>Proof of Claim</i>). Charge No. 515-2018-00239; and another against the Puerto Rico Fiscal Agency and Financial Advisory Authority (FAFAA), EEOC Charge No. 515-2018-00240. Cases: 18-CV-1993, 19-CV-1659 and 19-2084. And Claim No. 31895.

<p>(8) Describa en detalle fa naturaleza de su reclamaci6n y las fundamentos por las cuales usted cree que tiene derecho al beneficio reclamado. Incluya paginas adicionales si es necesario.</p>	<p>My one hundred (100) days of sick leave that total \$14,662.50, which, when I asked on the same day that I was fired in front of those who were at the tables, Mr. Camba said it was not one hundred (100) days; it was ninety-nine (99) days. Of these one hundred (100) days, I claimed ninety-one point six four zero (91.640) days in federal court because there was a deadline (a cut-off date). In court, I was given a claim number and then, the updated proof of claim arrived by mail (I was at the post office on December 10, 2018), in an envelope sent by "Prime Clerk LLC", 830 Third Avenue, New York, NY 10022.</p> <p>See Exhibits O and P. Also, see the following evidences: Exhibit 2021-ZZ61. Cases can be found at the website of the United States Court of Appeals for the First Circuit. And on the website of the USDC-PR.</p> <p>Plaintiff Pedro Ortiz Romero's principal place of correspondence is P.O. Box 190987, San Juan, P.R. 00919-0987. His phone number is 787-439-3156.</p>
--	---

*** Attach any supporting documentation you may have
related to your claim . ***

Exhibit - A

EEOC Form 5 (11/05)

CHARGE OF DISCRIMINATION		Charge Presented To: Agency(ies) Charge No(s):	
This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		<input type="checkbox"/> FEPA	515-2018-00239
		<input checked="" type="checkbox"/> EEOC	
Puerto Rico Dept. Of Labor - Antidiscrimination Unit and EEOC			
State or local Agency, if any			
Name (indicate Mr., Ms., Mrs.)		Home Phone (incl. Area Code)	Date of Birth
Pedro ORTIZ ROMERO		(787) 739-3156	1959
Street Address		City, State and ZIP Code	
P.O. Box 190987, San Juan, PR 00919			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name		No. Employees, Members	Phone No. (Include Area Code)
BANCO GUBERNAMENTAL DE FOMENTO		500 or More	(787) 722-2525
Street Address		City, State and ZIP Code	
P.O.Box 42001, San Juan, PR 00940			
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address		City, State and ZIP Code	
U.S. EEOC SAN JUAN LOCAL OFFICE			
DISCRIMINATION BASED ON (Check appropriate box(es).)		DATE(S) DISCRIMINATION TOOK PLACE	
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN		Earliest Latest	
<input type="checkbox"/> RETALIATION <input checked="" type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION		03-21-2018 03-21-2018	
<input type="checkbox"/> OTHER (Specify)		<input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):			
Soy Oficial de Pre-Intervencion para el patrono desde mayo del 2000. Tengo 58 años y 8 meses de edad.			
El Banco me ha discriminado debido a mi edad, porque no me dieron explicacion de la razon para mi despido a excepcion de la carta entregada en marzo 23, 2018, que sera efectivo el 22 de abril del 2018. No estoy conforme con esa explicacion que ellos (BGF) dieron. Según la carta que me entregaron en marzo 23, 2018, donde estuvieron las siguientes personas: Francisco Presidente Interino de la Union BGF, Jose Torres, representante de la Union, Yalixsa Carrion tomando nota, Guillermo Camba, anterior director de Recursos Humanos ahora Gerente de Operaciones y este servidor. El Sr. Camba leyo parte de la carta fechada marzo 21, 2018, que menciona la situacion del BGF, que según el es de mi conocimiento. En la carta menciona que es el cierre de operaciones del BGF. Cuando subi el 26 de marzo de 2018 al piso P a recoger parte de mis pertenencias, habian empleados trabajando (Jessica/Tatiana). Jessica me dijo que no se quedaria (le despidieron todo su			
I am filing this charge with both the EEOC and the State or local Agency, if any. I advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT	
Date: 05.05.2018		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	
Charging Party Signature			

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

☐ FEPA

☒ EEOC

515-2018-00239

Puerto Rico Dept. Of Labor - Antidiscrimination Unit

and EEOC

State or local Agency, if any

personal no puede trabajar asi menciono). Tatiana dijo que la ascendieron para contabilidad. Jessica dijo que llamaron a Maria Vazquez para trabajar. De eso ser asi, faltaria que me expliquen quien esta haciendo mi trabajo. Ver carta del 21 de marzo de 2018 entregada en marzo 23 de 2018 donde yo anote "recibida pero no aceptada". Ver anejo fechado marzo 13, 2013 y "Formulario de Eleccion" entregado en marzo 23, 2018. Ver carta de abril 4, 2018 relacionado a los dias marzo 23, 2018 y marzo 26, 2018.

He sido discriminado debido a mi edad (58), en violacion al "Age Discrimination in Employment Act" del 1967, según enmendada.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

Apr 05, 2018

Exhibit - B

EEOC Form 5 (11/05)

CHARGE OF DISCRIMINATION		Charge Presented To	Agency(ies) Charge No(s):
This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		<input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	515-2018-00240
Puerto Rico Dept. Of Labor - Antidiscrimination Unit and EEOC State or local Agency, if any			
Name (indicate Mr., Ms., Mrs.) Pedro Ortiz Romero		Home Phone (incl. Area Code) (787) 439-3156	Date of Birth 1959
Street Address P.O. Box 190987, San Juan, PR 00919 City, State and ZIP Code			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name AUTORIDAD DE ASESORIA FINANCIERA Y AGENCIA FISCAL DE P.R.		No. Employees, Members Unknown	Phone No. (Include Area Code) (787) 722-2525
Street Address P.O. Box 42001, San Juan, PR 00940 City, State and ZIP Code			
Name		No. Employees, Members APR 5 2018	Phone No. (Include Area Code)
Street Address U. S. EEOC SAN JUAN LOCAL OFFICE City, State and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate boxes.)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest	
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> RETALIATION <input checked="" type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		03-21-2018 03-21-2018 <input type="checkbox"/> CONTINUING ACTION	
Aplique para los puestos 7355 y 7358 en AAFAF. El 3/21/2018 durante el trabajo en el BGF me llamaron de Recursos Humanos para que fuera a recoger una carta. Se lo mencione a Jessica (Supervisora de Pre-Intervencion). Elsie Alvarado de R.H. me entrego la carta fechada 3/21/2018 y una copia para que la firmara. Se la firme. La carta fechada 3/21/2018 decia entre otras cosas que me llamaron para entrevista porque saque 90.11% pero que no fui seleccionado (no dice por que y no explica el criterio que utilizaron) ni menciona cual fue la persona seleccionada. En resumen, no dice nada de como se realizo la seleccion. El 3/23/2018 durante el trabajo en el BGF me llamaron de R.H. para que fuera a una reunion con el Sr. Camba en R.H. Se lo mencione a Jessica (Supervisor de Pre-Intervencion) estaban las siguientes personas: Francisco Presidente Interino de la Union BGF, Jose Torres, representante de la Union, Yalixsa Carrion tomando nota, Guillermo Camba, anterior director de Recursos Humanos ahora Gerente de Operaciones y este servidor. Le pregunte cual fue			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
Apr 05, 2018 Pedro Ortiz Romero Charging Party Signature		SIGNATURE OF COMPLAINANT	
		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

EEOC Form 5 (11/89)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA

☒ EEOC

515-2018-00240

Puerto Rico Dept. Of Labor - Antidiscrimination Unit

and EEOC

State or local Agency, if any

el criterio que utilizaron para seleccionar a los candidatos a los puestos. Le mencione que si no lo mencionan, yo pensaria que estan discriminando conmigo. El Sr. Guillermo Cambas dijo que son palabras fuertes. Le mencione que esa es mi opinion, si no me lo explican cual fue el criterio que ellos utilizaron para seleccionar a los candidatos a los puestos porque yo tengo 3 titulos y mas de 20 años de experiencia. Dijo el Sr. Cambas delante de las personas que estaban en la mesa que ellos (AAFAF) no tienen que explicarme eso (relacionado al criterio que utilizaron para seleccionar a los empleados). Yo le dije al Sr. Guillermo Cambas "me lo explica aquí en su oficina o me le explica en la corte porque esto son fondos publicos y yo tengo derechos y los voy a utilizar, y esto esta comenzando" (relacionado a querellas, demandas y procesos en corte). Tambien le mencione que yo se que yo no soy el mejor y que existen personas mejor que yo, lo que yo quiero es que me expliquen cual fue el criterio que ellos utilizaron para seleccionar a los candidatos a los puestos. Siguió con su negativa a explicarlo. Hacer referencia a la carta de marzo 21, 2018, firmada por Alejandro Camporreale, Esq.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

Apr 05, 2018

Date

Charging Party Signature



GOBIERNO DE PUERTO RICO

Autoridad de Asesoría Financiera y
Agencia Fiscal de Puerto Rico

Exhibit - E

21 de marzo de 2018

Sr. Pedro Ortiz Romero

PO Box 190987
San Juan, PR 00919-0987

Estimado señor Ortiz:

Reciba un saludo de parte de la Autoridad de Asesoría Financiera y Agencia Fiscal de Puerto Rico (en adelante, "AAFAF"). Acusamos recibo de su solicitud de empleo para el puesto 7355 y 7358 de Oficial de Cuentas por Pagar en 2/13/2018 y agradecemos su interés en formar parte del equipo.


Luego de la evaluación inicial de su solicitud, se determinó que la misma cumplió con los requisitos mínimos para ser entrevistado como candidato para el puesto antes mencionado. Dicha determinación fue basada en una evaluación de su preparación académica y/o experiencia laboral la cual arrojó una puntuación de 90.11, lo cual rebasa la cifra mínima de 70%. Es por ello que usted fue citada(o) y entrevistado(a) para el proceso de entrevistas.

Mediante la presente le informamos que el proceso de entrevistas ha finalizado y se seleccionó a la persona que ocupará el mencionado puesto. Lamentamos informarle que usted no fue la persona seleccionada.

Si desea alguna información adicional, o tiene alguna pregunta sobre el proceso de reclutamiento, puede comunicarse con la Sra. Elsy Alvarado, Gestora de Recursos Humanos al (787)722-2525 extensión 15554.

Reiteramos nuestro agradecimiento por querer formar parte del equipo de trabajo de la AAFAF y su disposición para trabajar por Puerto Rico.

Cordialmente,


Alejandro Camporreale, Esq
Chief Operating Office



GOBIERNO DE PUERTO RICO

Banco Gubernamental de Fomento para
Puerto Rico

Exhibit. - F

21 de marzo de 2018

Sr. Pedro Ortiz Romero

Departamento de Contabilidad y Finanzas

CIERRE DE OPERACIONES BGF

Estimado señor Ortiz:

Como es de su conocimiento, desde el pasado año el Banco Gubernamental de Fomento de Puerto Rico (BGF o Banco) ha estado trabajando con el proceso de reducción y eventual cierre de operaciones el cual forma parte de su plan fiscal aprobado por la Junta de Supervisión Fiscal. A esos efectos, durante el 2017 llevamos a cabo múltiples reuniones con todos los empleados en las cuales les informamos sobre los planes y la inminencia del cierre de operaciones, hicimos reuniones de preguntas y respuestas para atender sus preocupaciones, y se les ofreció un plan de renuncias voluntarias incentivadas a todos los empleados del BGF. Asimismo, organizamos ferias de empleo y talleres para ayudar a todos nuestros empleados a manejar este proceso de transición. En su caso particular, decidió no acogerse al programa de renuncias voluntarias incentivadas en los diferentes periodos de elección disponibles, cuyas fechas límites fueron el 30 de junio de 2017 y el 30 de noviembre del mismo año.

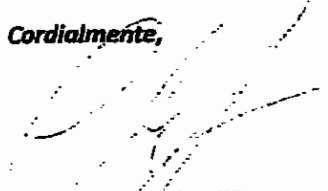
Le informamos que el cierre de operaciones del Banco se efectuará este próximo 23 de marzo de 2018. Efectivo el 26 de marzo de 2018, hasta el 22 de abril de 2018, usted permanecerá como empleado del BGF bajo la opción que usted elija entre las siguientes: a) agotar licencia de vacaciones acumuladas; b) acogerse a una licencia sin paga durante dicho periodo de tiempo. Adjunto encontrará el formulario de elección para que se le acredite este periodo a su balance de licencia de vacaciones. Si usted no entrega dicho formulario debidamente firmado y fechado a la oficina de Recursos Humanos y Relaciones Laborales, en o antes del 26 de marzo de 2018, se le acreditará el periodo del 26 de marzo al 22 de abril de 2018 a licencia sin paga.

Después del 22 de abril de 2018, de usted no haber recibido un ofrecimiento de empleo con alguna otra agencia de gobierno o corporación pública, usted cesará su relación de empleo con el BGF por razón del cierre de sus operaciones. Al usted ser cesanteado por el cierre de operaciones del Banco, recibirá, luego del 22 de abril y según autorizado por las leyes aplicables, la liquidación del remanente de la licencia de vacaciones no utilizada y otras a las cuales pudiera tener derecho.

Cierre de Operaciones BGF
Página 2
21 de marzo de 2018

Le agradecemos sus años de servicio y dedicación, más en este último año cuando, ante el inminente cierre del Banco, continuó brindando sus servicios con la misma calidad y empeño. Le deseamos el mayor de los éxitos en sus encomiendas futuras.

Cordialmente,



Christian Sobrino Vega
Presidente

[CERTIFIED TRANSLATION]

Exhibit - G

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PEDRO ORTIZ ROMERO (ORTIZ)

Plaintiff

VS

GOVERNMENTAL DEVELOPMENT
BANK FOR PUERTO RICO (GDB); ITS
PRESIDENT, CHRISTIAN SOBRINO; ITS
CHIEF OPERATIONS OFFICER,
GUILLERMO CAMBA.

Defendant

CIVIL NO. 18-CV-1993 (JAG)

RECEIVED
2018 DEC 20 PM 4:33
U.S. DISTRICT COURT
SAN JUAN, P.R.

COMPLAINT

TO THE HONORABLE COURT:

I. Statement of Jurisdiction

1. On April 5, 2018, I filed two charges: one against the Governmental Development Bank for Puerto Rico, Charge No. 515-2018-00239; and another against the Puerto Rico Fiscal Agency and Financial Advisory Authority (FAFAA), EEOC Charge No. 515-2018-00240. Both charges were for age discrimination. See Exhibits A and B.
2. Charge No. 515-2018-00239 against the GDB was answered by a letter, and I refuted it with another letter and evidence on May 14, 2018, where I objected it and rejected its position and arguments. See Exhibits C and D.
3. On September 28, 2018, the Equal Employment Opportunity Commission (EEOC) sent a letter with the "NOTICE OF SUIT RIGHTS." See Exhibit E.
4. This Honorable Court has jurisdiction over this action pursuant to 28 U.S.C. & 1367, 1391, and 48 U.S.C.

RECEIVED

DEC 21 2018

U. S. EEOC
SAN JUAN LOCAL OFFICE

[CERTIFIED TRANSLATION]

II. Statement of the Parties

5. Plaintiff Pedro Ortiz Romero's principal place of correspondence is P.O. Box 190987, San Juan, P.R. 00919-0987. His phone number is 787-439-3156.

6. Defendant Governmental Development Bank for Puerto Rico (GDB) was a public corporation entity (June 30, 2018) created as a banking institution by Puerto Rico Public Law No. 17 of September 23, 1948, as amended, 7 L.P.R.A., 551 et seq. Its principal place of correspondence is P.O. Box 42001, San Juan, Puerto Rico 00940-2001 and its phone number is 787-722-2525. See Exhibit F.

7. Defendant Christian Sobrino was the president of the GDB and chairman of FAFAA until June 30, 2018. He is now the president of FAFAA. The plaintiff is suing Christian Sobrino in his official capacity.

8. Defendant Guillermo Camba ("Camba") was a director of Human Resources and Labor Relations until October 15, 2012. He was the GDB's chief operations officer until March 23, 2018. The plaintiff is suing Guillermo Camba ("Camba") in his official capacity.

III. Statement of Claims

9. I am filing this Complaint as a pro se litigant. I, the plaintiff (Ortiz) can pay a reasonable fee (\$100.00 to \$150.00) to an attorney. The problem is that I have been seeking an attorney for months, but nobody wants the case. Some of the reasons they have given me include: they do not work or take on labor cases; they only take on cases involving corporations; they have some sort of conflict because they previously worked on cases for the GDP or they were advisors to bondholders; or they do not work on cases involving government agencies, among several other reasons.

10. For that reason, I am attaching with this complaint, a request to this Honorable

[CERTIFIED TRANSLATION]

Court of Justice for an extension of 90 additional days, in accordance with the EEOC letters entitled "Dismissal and Notice of Rights" and "Notice of Suit Rights" dated September 28, 2018. On December 11, 2018, pursuant to Title IV of PROMESA, I asked the Honorable Court of Justice for permission to sue, because I found out that I had to request it. I didn't know it, and neither the EEOC nor the letter mentioned it.

11. I worked for the Governmental Development Bank for Puerto Rico from May 2000 to March 23, 2018, when I was fired. At that time, Christian Sobrino was its president as well as the chairman of the board for FAFAA (according to newspaper reports). It was he who, through a letter dated March 21, 2018, and delivered on March 23, 2018, by Guillermo Camba ("Camba"), the GDB's chief operations officer [sic], along with a copy on which I wrote the following: "Received, but not accepted." I was fired discriminatorily from the GDB. See Exhibit F.

12. On March 23, 2018, the following employees were left in the Pre-intervention Department:

13. [sic] Nine (9) employees, of which I, the plaintiff (Pedro Ortiz Romero), was the oldest at 58 years of age and several months. Five (5) accepted the incentive; two (2) were accepted into FAFAA; and one (1) I'm not sure if she was relocated to another agency; and I, the plaintiff (Ortiz), who was up in age at 58 years and several months at that time, was fired on the morning of March 23, 2018.

14. Before all of this, I had applied for two positions (7355 and 7358) with the Puerto Rico Fiscal Agency and Financial Advisory Authority (FAFAA). On Wednesday, March 21, 2018, I was given a letter signed by Alejandro Camporeales, the Chief Operations Officer of FAFAA, denying me the positions applied for. In said letter, he mentioned, among other things,

the following: "We regret to inform you that you were not the person selected." See Exhibit G.

15. In addition to being the oldest employee in the Pre-intervention Department, I was also the employee with the most experience in the job that I did, which was to review contracts, invoices, service orders, and other responsibilities. See Exhibits H, I, and Q.

16. The work I did as a public servant for the GDB was a very important, ongoing job (a specialized job) that could not be left undone. It had to be done. That was my job (among other responsibilities) with the GDB from 2000 to March 23, 2018. That was the job I was doing when I was fired on March 23, 2018.

17. I asked Guillermo Camba (at the meeting) who was going to work with the invoices and contracts. He said someone else would have to take care of it.

18. On March 23, 2018, the GDB was left with employees younger than me and with less experience than me. When I went up (March 26, 2018) to Floor P to collect some of my belongings, there were employees working (Jessica/Tatiana). Jessica said that she wasn't staying (all of her staff was fired; she could not work like that, she said). She also said that Maria Vázquez (Vázquez) was called in to work. See Exhibits J and K.

19. The ADEA provides that it is unlawful for an employer to "refuse to hire or to discharge any individual or otherwise discriminate against (him) with respect to his compensation, terms, conditions, or privileges of employment because of such individual's age." 29 U.S.C. 623 (a)(1), (d).

20. With regard to the call to Maria Vázquez to work, I state the following: María Vázquez accepted the separation from employment offer that the GDB

[CERTIFIED TRANSLATION]

made to the employees. According to page 5 of the letter from Pietrantoní Méndez & Álvarez (PMA), Vázquez was 55 years old and Tatiana Delgado (Delgado) was 29 at that time. See Exhibit L.

Discrimination is illegal. See. O'Connor v. Consolidated Coin Carterers Corp., 134 L. Ed Second 433 (No. 95-354 Argued February 27, 1996; decided April 1, 1996).

21. If they called her and she accepted it, it was to do my job.

(i) When I, the plaintiff (Ortiz), was fired from the GDB on March 23, 2018, I was 58 years old at the time.

(ii) I have the following college degrees (three):

An associate degree in Accounting

A bachelor's degree in Accounting

A bachelor's degree in computer programming.

(iii) On Friday, March 23, 2018, I was fired from the Governmental Development Bank for Puerto Rico through a letter dated March 21, 2018, and submitted on March 23, 2018, by Guillermo Camba ("Camba"), GDB's Chief Operations Officer, along with a copy, on which I wrote the following: "Received, but not accepted."

(iv) When I went up to Floor P (March 26, 2018) to pick up some of my belongings, there were employees working. Jessica, the Pre-intervention supervisor, said that Maria Vázquez (Vázquez) was called to work.

Tatiana Delgado said that they promoted her to accounting. She asked me about some invoices that I was working on and I explained to her how I worked on them. See. Acevedo Parrilla v. Novartis EX Lax Inc., No. 10-2276 (1st Cir. 2012). See. Soto Feliciano v. Villa Cofresí Hotels, Inc. No. 13-2296 (1st Cir. 2015). See. Magda I. Alvarez v. Eric K. Shinseki. No. 12-1022 (GAG).

[CERTIFIED TRANSLATION]

22. The GDB made different offers to its employees for their job position, based on years of service. Some were offered one week, others two weeks, or three weeks plus six months of wages, if they qualified, among other things. That was their offer that was entirely verbal, because I was never given anything in writing.

In other words, they were buying the positions.

23. In my case, I, the plaintiff, did not accept their offer and, in retaliation and discriminatorily, I was fired, and they kept my job position and gave it to someone else.

24. The work that I, the complainant, did was a specialized and ongoing job; it had to be done and it could not be left undone. By that I mean I, the plaintiff, worked with the following: contracts, service orders, PROMESA contracts, PROMESA invoices, and other jobs. See Exhibits M and R.

IV. Statement of Relief

When the GDB fired me on the morning of Friday, March 23, 2018, I was not allowed to submit my offer, and by suing them, I now have the opportunity to submit it. Therefore, my offer is as follows:

I worked for the GDB for 17 years and 10 months (from May 2000 to March 23, 2018).

My monthly salary was \$3,177.30 See Exhibit N.

At 12 months, the total was \$38,127.60

\$38,127.60 * 17.833333 = \$679,942.19. This is my offer (it is the price of my job position for 17 years and 10 months).

I also ask payment from the GDB for the following:

[CERTIFIED TRANSLATION]

My sixty-three (63) days of vacation that total \$9,237.38, which, according to the letter dated March 21, 2018, and submitted on March 23, 2018, mentions that it would be paid to me. However, as of today, December 12, 2018, I have not been paid. See Exhibits F and O.

My one hundred (100) days of sick leave that total \$14,662.50, which, when I asked on the same day that I was fired in front of those who were at the tables, Mr. Camba said it was not one hundred (100) days; it was ninety-nine (99) days.

Summary:

\$679,942.19	my offer
\$9,237.38	my vacation leave
<u>\$14,662.50</u>	my days of sick leave
\$703,832.07	Total demand

Of these one hundred (100) days, I claimed ninety-one point six four zero (91.640) days in federal court because there was a deadline (a cut-off date). In court, I was given a claim number and then, the updated proof of claim arrived by mail (I was at the post office on December 10, 2018), in an envelope sent by "Prime Clerk LLC", 830 Third Avenue, New York, NY 10022. See Exhibits O and P.

Wherefore, premises considered, Plaintiff seeks that an award be entered ordering defendants to pay to the Plaintiff the monetary damages, as alleged in IV Statement of Relief of this complaint, including all consequential damages and statutory and/or punitive damages, plus interest and cost, including attorney's fees, an amount which Plaintiff reserves the right to amend at any time. Plaintiff also respectfully requests the following:

1. Any and all other relief available to Plaintiff, in law or equity or otherwise, which may be granted by this Honorable Court.
2. All costs of these proceedings and for recovery of damages incurred, including

[CERTIFIED TRANSLATION]

legal fees, including while on appeal, if any, and for collection.

V. Jury Demand

I, the plaintiff, ask this Honorable Court of Justice for a jury trial to which I, as a tax payer and U.S. citizen, am entitled.

Respectfully submitted.

Date: In San Juan, Puerto Rico, on this 12th day of December, 2018.

Your signature: _____

Pedro Ortiz Romero - Pro Se

Name, typewritten or printed: Pedro Ortiz Romero – Pro Se.

Address: P.O. Box 190987, SAN JUAN, PR 00919-0987

Telephone Number: 787-439-3156.

CERTIFICATE OF TRANSLATION INTO ENGLISH

I, Sonia Crescioni of legal age, single, resident of San Juan, P.R., professional interpreter/ translator, certified by the Administrative Office of the United States Courts, do HEREBY CERTIFY that I have personally revised the foregoing document and that it is a true and accurate review to the best of my knowledge and abilities.

In San Juan, Puerto Rico, today December 10, 2018.

Sonia Crescioni
Sonia Crescioni, M.A., U.S.C.C.I.
Atabex Translation Specialists, Inc.
PO Box 195044, San Juan, PR 00919-5044

Exhibit - O

http://bgfonline/Balances/balances.asp

Aquí BGF Electrónico

File Edit View Favorites Tools Help

Free Hotmail Microsoft Support

BGF

Inicio BGF Comunes Servicio al Empleado Bata Gubernamental Adiestramiento y Desarrollo Reclutamiento

Servicio al Empleado

21

CALENDARIO DE ACTIVIDADES

5:20:50 pm

DIRECTORIO TELEFÓNICO

BALANCES Y LICENCIAS

FORMULARIOS Y SOLICITUDES

Empleado: POR3500 - PEDRO ORTIZ ROMERO

Hasta	06/30/2017
Vacaciones	61.080
Enfermedad	91.640

Los balances que se proveen a través de este sistema son estimados al fin del mes escogido y podrían no incluir actualizaciones que están en proceso. Los balances están en días.

Aportación del Empleado al Sistema de Retiro al 30 de Junio del 2013: \$28,013.78

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO / TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS PARA EL DISTRITO DE PUERTO RICO

Fill in this information to identify the case (Select only one Debtor per claim form). / Llene esta información para identificar el caso (seleccione solo un deudor por formulario de reclamación).

<input checked="" type="checkbox"/> Commonwealth of Puerto Rico El Estado Libre Asociado de Puerto Rico	Case No. 17-bk-03283	Petition Date: May 3, 2017
<input type="checkbox"/> Puerto Rico Sales Tax Financing Corporation (COFINA) La Corporación del Fondo de Interés Apremiante de Puerto Rico	Case No. 17-bk-03284	Petition Date: May 5, 2017
<input type="checkbox"/> Puerto Rico Highways and Transportation Authority La Autoridad de Carreteras y Transportación de Puerto Rico	Case No. 17-bk-03567	Petition Date: May 21, 2017
<input type="checkbox"/> Employees Retirement System of the Government of the Commonwealth of Puerto Rico El Sistema de Retiro de los Empleados del Gobierno del Estado Libre Asociado de Puerto Rico	Case No. 17-bk-03566	Petition Date: May 21, 2017
<input type="checkbox"/> Puerto Rico Electric Power Authority La Autoridad de Energía Eléctrica de Puerto Rico	Case No. 17-bk-04780	Petition Date: July 2, 2017

MMLID: 1078003

EPOC ID: 170356600338861

Claim No. []
Initials []

RECEIVED

Debtor Employees Retirement System of the Government of the Commonwealth of Puerto Rico has listed your claim in their Creditor List on Schedule F – Participant Obligations as a Contingent, Unliquidated general unsecured claim in an Undetermined amount. You must timely file a proof of claim or be forever barred from participating or sharing in any distribution or being treated as a claim for purposes of voting or distribution.

El deudor Employees Retirement System of the Government of the Commonwealth of Puerto Rico ha listado su reclamación en la lista de acreedores en el Schedule F – Obligaciones de los participantes como un reclamo Contingente, Sin liquidez no asegurado por un monto Indeterminado. Debe presentar una prueba de reclamación oportunamente o se le prohibirá por siempre participar o compartir en cualquier distribución o ser tratado como un reclamo para fines de votación o distribución.

Modified Official Form 410 / Formulario Oficial 410 Modificado

Proof of Claim / Evidencia de reclamación

CDS 1/15/16 04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a Title III case. Do not use this form to make a request for payment of an administrative expense, other than a claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9). Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy or subject to confidentiality on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

Lea las instrucciones antes de completar este formulario. Este formulario está diseñado para realizar una reclamación de pago en un caso en virtud del Título III. No utilice este formulario para solicitar el pago de un gasto administrativo que no sea una reclamación que reúna los requisitos para ser tratada como prioridad administrativa conforme al Título 11 § 503(b)(9) del U.S.C. Ese tipo de solicitud debe realizarse de conformidad con el Título 11 § 503 del U.S.C.

Quienes presenten la documentación deben omitir o editar información que reúna los requisitos para ser tratada con privacidad o confidencialidad en este formulario o en cualquier otro documento adjunto. Adjunte copias editadas de cualquier otro documento que respalde la reclamación, tales como pagarés, órdenes de compra, facturas, balances detallados de cuentas en funcionamiento, contratos, resoluciones judiciales, hipotecas y acuerdos de garantías. No adjunte documentos originales, ya que es posible que los documentos adjuntos se destruyan luego de analizarlos. En caso de que los documentos no estén disponibles, explique los motivos en un anexo.

Fill in all the information about the claim as of the Petition Date.

Complete toda la información acerca de la reclamación a la fecha en la que se presentó el caso.

Part 1 / Parte 1

Identify the Claim / Identificar la reclamación

1. Who is the current creditor?

¿Quién es el acreedor actual?

PEDRO ORTIZ ROMERO

Name of the current creditor (the person or entity to be paid for this claim)
Nombre al acreedor actual (la persona o la entidad a la que se le pagará la reclamación)

Other names the creditor used with the debtor
Otros nombres que el acreedor usó con el deudor

RECEIVED

MAY 30 2018



PRIME CLERK LLC



2. Has this claim been acquired from someone else?
☒ No / No
☐ Yes. From whom? Sí. ¿De quién?

¿Esta reclamación se ha adquirido de otra persona?

3. Where should notices and payments to the creditor be sent?
 Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)
 ¿A dónde deberían enviarse las notificaciones al acreedor?
 Norma federal del procedimiento de quiebra (FRBP, por sus siglas en inglés) 2002(g)

Where should notices to the creditor be sent?
 ¿A dónde deberían enviarse las notificaciones al acreedor?
 PEDRO ORTIZ ROMERO
 PO BOX 190987
 SAN JUAN PR 00918-0987

Where should payments to the creditor be sent? (if different)
 ¿A dónde deberían enviarse los pagos al acreedor? (En caso de que sea diferente)

Name / Nombre
 Number / Número Street / Calle
 City / Ciudad State / Estado ZIP Code / Código postal
 Contact phone / Teléfono de contacto
 Contact email / Correo electrónico de contacto

4. Does this claim amend one already filed?
☒ No / No
☐ Yes. Claim number on court claims registry (if known)
 ¿Esta reclamación es una enmienda de otra presentada anteriormente?
 Sí. Número de reclamación en el registro de reclamaciones judiciales (en caso de saberlo)
 Filed on / Presentada el (MM/DD/YYYY) / (DD/MM/AAAA)

5. Do you know if anyone else has filed a proof of claim for this claim?
☒ No / No
☐ Yes. Who made the earlier filing?
 ¿Sabe si alguien más presentó una evidencia de reclamación para esta reclamación?
 Sí. ¿Quién hizo la reclamación anterior?

Part 2 / Parte 2:

Give Information About the Claim as of the Petition Date

Complete toda la información acerca de la reclamación desde la fecha en la que se presentó el caso.

6. Do you have a claim against a specific agency or department of the Commonwealth of Puerto Rico?
☐ No / No
☒ Yes. Identify the agency or department and contact name. (A list of Commonwealth of Puerto Rico agencies and departments is available at: <https://cases.primeclerk.com/puertorico/>)
 ¿Tiene una reclamación en contra de algún organismo o departamento específico del Estado Libre Asociado de Puerto Rico?
 Sí. Identifique el organismo o departamento y nombre del representante. (Una lista de agencias y departamentos del Estado Libre Asociado de Puerto Rico está disponible en: <https://cases.primeclerk.com/puertorico/>)
Banco Gubernamental de Fomento (BGF)

7. Do you supply goods and / or services to the government?
☒ No / No
☐ Yes. Provide the additional information set forth below / Sí. Proporcionar la información adicional establecida a continuación:
 ¿Proporciona bienes y / o servicios al gobierno?
 Vendor / Contract Number | Número de proveedor / contrato:
 List any amounts due after the Petition Date (listed above) but before June 30, 2017:
 Anote la cantidad que se le debe después de la fecha que se presentó el caso (mencionados anteriormente), pero antes del 30 de junio de 2017 \$

8. How much is the claim?

\$ 14,553.00

Does this amount include interest or other charges?

¿Este importe incluye intereses u otros cargos?

☒ No / No☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

Si. Adjunte un balance con intereses detallados, honorarios, gastos u otros cargos exigidos por la Norma de Quiebras 3001(c)(2)(A).

9. What is the basis of the claim?

¿Cuál es el fundamento de la reclamación?

Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or creditcard. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.

Por ejemplo: Venta de bienes, préstamo de dinero, arrendamiento, prestación de servicios, lesiones personales u homicidio culposo, o tarjetas de crédito. Adjunte copias editadas de cualquier documento que respalde la reclamación conforme a lo exigido por la Norma de Quiebras 3001(c). Limite la divulgación de información que reúne los requisitos para ser tratada con privacidad, tal como información sobre atención médica.

Días acumulados de Infirmidad.

10. Is all or part of the claim secured?

¿La reclamación está garantizada de manera total o parcial?

☒ No / No☐ Yes. The claim is secured by a lien on property.

Sí. La reclamación está garantizada por un derecho de retención sobre un bien.

Nature of property / Naturaleza del bien:

☐ Motor vehicle / Vehículos☐ Other. Describe:

Otro. Describir:

Basis for perfection / Fundamento de la realización de pasos adicionales:

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Adjunte copias editadas de documentos, si los hubiere, que demuestre la realización de pasos adicionales para hacer valer un derecho de garantía (por ejemplo, una hipoteca, un derecho de retención, un certificado de propiedad, una declaración de financiamiento u otro documento que demuestre que se ha presentado o registrado un derecho de retención.

Value of property / Valor del bien: \$ _____

Amount of the claim that is secured /

Importe de la reclamación que está garantizado: \$ _____

Amount of the claim that is unsecured /

Importe de la reclamación que no está garantizado: \$ _____

(The sum of the secured and unsecured amounts should match the amount in line 7.)

(La suma del importe garantizado y no garantizado debe coincidir con el importe de la línea 7.)

Amount necessary to cure any default as of the Petition Date /

Importe necesario para compensar toda cesación de pago a la fecha que se presentó el caso: \$ _____

Annual Interest Rate (on the Petition Date)

Tasa de interés anual (cuando se presentó el caso) _____ %

☐ Fixed / Fija☐ Variable / Variable

11. Is this claim based on a lease?

¿Esta reclamación está basada en un arrendamiento?

☒ No / No☐ Yes. Amount necessary to cure any default as of the Petition Date.

Sí. Importe necesario para compensar toda cesación de pago a partir de la que se presentó el caso: \$ _____



12. Is this claim subject to a right of setoff?

☒ No / No

¿La reclamación está sujeta a un derecho de compensación?

☐ Yes. Identify the property /
Sí. Identifique el bien: _____

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

☒ No / No

☐ Yes. Indicate the amount of your claim arising from the value of any goods received \$ _____ by the debtor within 20 days before the Petition Date in these Title III case(s), in which the goods have been sold to the debtor in the ordinary course of such debtor's business. Attach documentation supporting such claim.

¿La reclamación, total o parcial, cumple los requisitos para ser tratada como prioridad administrativa conforme al Título 11 § 503(b)(9) del U.S.C.?

Sí. Indique el importe de la reclamación que surge del valor de cualquier bien recibido por el deudor dentro de los 20 días anteriores a la fecha de inicio en estos casos del Título III, en el que los bienes se han vendido al deudor en el transcurso normal de los negocios del deudor. Adjunte la documentación que respalda dicha reclamación.

Part 3 / Parte 3:

Sign Below / Firmar a continuación

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

La persona que complete esta evidencia de reclamación debe firmar e indicar la fecha. FRBP 9011(b).

Si presenta esta reclamación de manera electrónica, la FRBP 5005(a)(2) autoriza al tribunal a establecer normas locales para especificar qué se considera una firma.

Check the appropriate box / Marque la casilla correspondiente:

- ☒ I am the creditor. / Soy el acreedor.
☐ I am the creditor's attorney or authorized agent. / Soy el abogado o agente autorizado del acreedor.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004. / Soy el síndico, el deudor o su agente autorizado. Norma de quiebra 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005. / Soy el garante, fiador, endosante u otro codeudor. Norma de quiebra 3005.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

Comprendo que una firma autorizada en esta Evidencia de reclamación se considera como un reconocimiento de que al calcular el importe de la reclamación, el acreedor le proporcionó al deudor crédito para todo pago recibido para saldar la deuda.

I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.

He leído la información en esta Evidencia de reclamación y tengo motivos razonables para suponer que la información es verdadera y correcta.

I declare under penalty of perjury that the foregoing is true and correct. / Declaro bajo pena de perjurio que lo que antecede es verdadero y correcto.

Executed on date / Ejecutado el 5/24/2018 (MM/DD/YYYY) / (DD/MM/AAAA)

Signature / Firma

Print the name of the person who is completing and signing this claim / Escriba en letra de imprenta el nombre de la persona que completa y firma esta reclamación:

Name

First name / Primer nombre

Middle name / Segundo nombre

Last name / Apellido

Title / Cargo

Company / Compañía

Identify the corporate servicer as the company if the authorized agent is a servicer. / Identifique al recaudador corporativo como la compañía si el agente autorizado es un recaudador.

Address / Dirección

Number / Número

Street / Calle

City / Ciudad

State / Estado

ZIP Code / Código postal

Contact phone / Teléfono de contacto

Email / Correo electrónico

Federico Degetau Federal Building
and Clemente Ruiz Nazario U.S. Courthouse
Clerk's Office
150 Avenida Carlos Chardón
San Juan Puerto Rico 00918-1767

Evidencia adicional de reclamación.

Acreeedor Actual: Pedro Ortiz Romero

Estoy reclamando noventa y un día y punto sesenta y cuatro (91.640) acumulados de enfermedad que el Banco Gubernamental de Fomento para Puerto Rico no me ha pagado al día de hoy.

Estos datos son para poder realizar los computos y poder determininal los días y la tarifa por hora.

Mensual	\$ 3,177.30	\$ 162.50 Horas Mensual
División	<u>2.00</u>	2.00
Quincenal	\$ 1,588.65	\$ 81.25 Horas Quincenal
División	<u>2.00</u>	\$ 2.00
Semanal	\$ 794.33	\$ 40.63 Horas Semanal
Horas Semanal (Div. Por semana)	<u>40.63</u>	<u>5.00</u> Días
Tarifa por hora	19.55	8.13 Total de horas diarias.

Días de Enfermedad acumulados	91.64
Horas diarias.	<u>8.13</u>
Total de horas reclamadas.	<u>744.67</u>

744.67 Total de horas reclamadas.
<u>19.55 Tarifa por hora</u>
<u>\$ 14,558.23 Cantidad reclamada.</u>

De surgir alguna pregunta sobre esto favor de comunicarse con este servidor al siguiente telefono o a la siguiente direccion.

Telph: - 787-439-3156
PEDRO ORTIZ ROMERO
PO. BOX 190987
SAN JUAN "PR. 00918-0987

Saludos

Pedro Ortiz Romero

Nota;

Ver copia de la hoja (pantalla) del BGF - Online Balances.
Estos balances no son balances exactos ni cómputos exacto.

Prime Clerk LLC
600 Third Avenue
New York, NY 10022



Pedro Ortiz Romero
P. O. Box 190987
San Juan P. R. 00918-0987

00918-098787

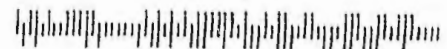


Exhibit. - ZY

RECEIPT #	2018000481
AMOUNT:	\$400.00
JUL 10 2019	
CASHIER'S SIGNATURE	

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PEDRO ORTIZ ROMERO

Plaintiff

v.

Puerto Rico Fiscal Agency and Financial Advisory
Authority (AAFAF, Spanish acronym); ITS
PRESIDENT, CHRISTIAN SOBRINO; ITS
CHIEF OPERATIONS OFFICER,
ALEJANDRO CAMPOREALES

Defendants

CIVIL CASE NO. 19-cv-1659 (W64)

Employment Discrimination

PLAINTIFF DEMANDS
TRIAL BY JURY

COMPLAINT

TO THE HONORABLE COURT:

Comes now, plaintiff Pedro Ortiz Romero ("Plaintiff" or "Mr. Ortiz") and very respectfully states and prays as follows:

I.

Nature of Action and Jurisdiction

1. This Honorable court has jurisdiction over this action pursuant to Section 7 of the ADEA, 29 U.S.C. §§621 and 626(c)(1) and 28 U.S.C. §§1331 and 1342(a)(4).
2. The U.S. District Court for the District of Puerto Rico is the proper venue for this action pursuant to 28 U.S.C. §§1367 and 1391(a), (b)(1), and (b)(2), as this is the District in which Plaintiff resides and in which all of the events giving rise to the claims occurred.
3. On April 5, 2018, Plaintiff filed two charges for age discrimination: one against the Government Development Bank for Puerto Rico, Charge No. 515-2018-00239; and another one against the Puerto Rico Fiscal Agency and Financial Advisory Authority (AAFAF, Spanish acronym), EEOC Charge No. 515-2018-00240. See Exhibits A and B.

U.S. DISTRICT COURT
SAN JUAN, PR
2021 APR -5 PM 2:28

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PEDRO ORTIZ ROMERO

Plaintiff

v.

Puerto Rico Fiscal Agency and Financial Advisory
Authority (AAFAF, Spanish acronym); ITS
PRESIDENT, CHRISTIAN SOBRINO; ITS
CHIEF OPERATIONS OFFICER,
ALEJANDRO CAMPOREALES

Defendants

CIVIL-.No.19-CV-1659(WGY)

Employment Discrimination

PLAINTIFF DEMANDS
TRIAL BY JURY

INFORMATION MOTION RELATED TO RULE 26 (A), 26 (B), 26 (F) AND TO THE
MARCH 09, 2021 ORDER NUMBER 54 AND PURSUANT TO THE FED. R. CIV. P.26
(F).

TO THE HONORABLE COURT:

Comes now, plaintiff Pedro Ortiz Romero ("Plaintiff" or "Mr. Ortiz") and very
respectfully states and prays as follows:

- A. Plaintiff is informing this Honorable Court that, as of this date, April 5, 2021, he
has not found a legal counsel who will represent him in this case for the reasons he
mentioned in the Complaint. See. Exhibit Z37.

INFORMATION

1. I will mention the following if the court allows me:

Exhibit. -	2021-ZZ11
------------	-----------

**United States Court of Appeals
For the First Circuit**

No. 19-2084

PEDRO ORTIZ ROMERO,

Plaintiff - Appellant,

v.

GOVERNMENTAL DEVELOPMENT BANK FOR PUERTO RICO (GDB);
ITS PRESIDENT; CHRISTIAN SOBRINO VEGA; ITS CHIEF OPERATIONS
OFFICER, GUILLERMO CAMBA-CASAS,

Defendants - Appellees.

APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE DISTRICT
OF PUERTO RICO

[Hon. Jay A. García-Gregory, U.S. District Judge]

Before

Circuit Judges.

INFORMATIVE MOTION

April 16, 2021

Exhibit - 2021-ZZ14

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PEDRO ORTIZ ROMERO

Plaintiff

v.

Puerto Rico Fiscal Agency and Financial Advisory
Authority (AAFAF, Spanish acronym); ITS
PRESIDENT, CHRISTIAN SOBRINO; ITS
CHIEF OPERATIONS OFFICER,
ALEJANDRO CAMPOREALES

Defendants

CIVIL-No.19-CV-1659(WGY)

Employment Discrimination

PLAINTIFF DEMANDS
TRIAL BY JURY

**MOTION TO SUPPRESS (CANCEL) THE DEPOSITION AND EVERYTHING
RELATED AND NOT RELATED WITH THE TO ORDER NUM. 54.**

TO THE HONORABLE COURT:

Comes now, plaintiff Pedro Ortiz Romero ("Plaintiff" or "Mr. Ortiz") and very respectfully states and prays as follows:

- I. Plaintiff is informing this Honorable Court that, as of this date, April 27, 2021, he has not found a legal counsel who will represent him in this case for the reasons he mentioned in the Complaint. See. Exhibit Z37.

INFORMATION

- A. I will mention the following if the Court allows me:

I am requesting to Delete (Cancel) the deposition of March 29, 2021 and all

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PEDRO ORTIZ ROMERO]	
]	
Plaintiff]	CIVIL-No.19-CV-1659(WGY)
]	
v.]	Employment Discrimination
]	
Puerto Rico Fiscal Agency and Financial Advisory]	
Authority (AAFAF, Spanish acronym); ITS]	
PRESIDENT, CHRISTIAN SOBRINO; ITS]	
CHIEF OPERATIONS OFFICER,]	
ALEJANDRO CAMPOREALES]	PLAINTIFF DEMANDS
]	TRIAL BY JURY
Defendants]	

MOTION FOR ORDERS RELATED TO THE DEPOSITION OF MARCH 29,
2021 AND TO RULES 28 AND 30 OF THE FEDERAL RULES OF CIVIL
PROCEDURE.

TO THE HONORABLE COURT:

Comes now, plaintiff Pedro Ortiz Romero ("Plaintiff" or "Mr. Ortiz") and
very respectfully states and prays as follows:

- A. Plaintiff is informing this Honorable Court that, as of this date, May
4, 2021, he has not found a legal counsel who will represent him in this
case for the reasons he mentioned in the Complaint. See. Exhibit Z37.

INFORMATION

- I. I will mention the following if the court allows me:

I am requesting a motion of orders related to the deposition of March 29,

Exhibit. - 2021-ZZ19

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PEDRO ORTIZ ROMERO

Plaintiff

v.

Puerto Rico Fiscal Agency and Financial Advisory
Authority (AAFAF, Spanish acronym); ITS
PRESIDENT, CHRISTIAN SOBRINO; ITS
CHIEF OPERATIONS OFFICER,
ALEJANDRO CAMPOREALES

Defendants

CIVIL-No.19-CV-1659(WGY)

Employment Discrimination

PLAINTIFF DEMANDS
TRIAL BY JURY

**MOTION REQUESTING A HEARING OF EVIDENCE ON THE DEPOSITION
OF MARCH 29, 2021.**

TO THE HONORABLE COURT:

Comes now, plaintiff Pedro Ortiz Romero ("Plaintiff" or "Mr. Ortiz") and very respectfully states and prays as follows:

- A. Plaintiff is informing this Honorable Court that, as of this date, May 4, 2021, he has not found a legal counsel who will represent him in this case for the reasons he mentioned in the Complaint. See. Exhibit Z37.

INFORMATION

1. I will mention the following if the court allows me:
2. As in the deposition of March 29, 2021 there was no representation of this Honorable Court, this plaintiff summarizes what happened during the arrival and

United States Court of Appeals For the First Circuit

No. 19-2084

PEDRO ORTIZ-ROMERO

Plaintiff - Appellant

v.

GOVERNMENT DEVELOPMENT BANK FOR PUERTO RICO; CHRISTIAN SOBRINO-
VEGA; GUILLERMO CAMBA-CASAS

Defendants - Appellees

APPELLANT'S BRIEFING NOTICE

Issued: June 3, 2021

The record on appeal now being complete with the filing of the transcripts, or Transcript Report Form, appellant's brief must be filed by **July 13, 2021**. Unless appellant is pro se and proceeding in forma pauperis, an appendix must also be filed by **July 13, 2021**.

The deadline for filing appellee's brief will be set in accordance with Fed. R. App. P. 31 and 1st Cir. R. 31.0. Parties are advised that extensions of time are not normally allowed without timely motion for good cause shown.

The parties are advised to review the First Circuit Rulebook, with particular attention to the following Federal and Local Rules of Appellate Procedure:

1st Cir. R. 11.0, 28.0 and 28.1

Briefs are public documents and will not be sealed absent timely motion. Sealed or non-public documents, such as a presentence investigation report or statement of reasons in a criminal case, must be filed in a separate volume of the addendum or appendix clearly marked "FILED UNDER SEAL."

Fed. R. App. P. 28(a)(8)(A) and 28(e)

Briefs must contain citations to the parts of the record on which the appellant relies. References to parts of the record contained in the appendix must be to the pages of the appendix. If the brief refers to an unreproduced part

Exhibit. - 2021-ZZ53

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

CIVIL No. 19-CV-1659 (WGY)

PEDRO ORTIZ ROMERO

Plaintiff

v.

Puerto Rico Fiscal Agency and Financial Advisory
Authority (AAFAF, Spanish acronym); ITS
PRESIDENT, CHRISTIAN SOBRINO; ITS
CHIEF OPERATIONS OFFICER,
ALEJANDRO CAMPOREALES

Defendants

Notice of Appeal

Notice is hereby given that **PEDRO ORTIZ ROMERO**, (Plaintiffs),
in the above named case, hereby appeal to the United States Court of
Appeals for the First (1st) Circuit of Boston.

On June 4, 2021, the court issued Order 78 which mentions the following:

**ORDER. "The motion for summary judgment is allowed for
the reasons set forth in the defendants' memorandum. Judgment
shall enter for the defendants." Signed by Judge William G. Young
on 6/4/2021. See Exhibit 2021-ZZ49.**

On July 2, 2021, the Court sent eleven (11) Orders, (received by mail July

SRF 53533

Exhibit 2021-ZZ55

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

TWELFTH NOTICE OF TRANSFER OF CLAIMS
TO ADMINISTRATIVE CLAIMS RECONCILIATION

To the Honorable United States District Judge Laura Taylor Swain:

1. On March 12, 2020, this Court entered the *Order (A) Authorizing Administrative Reconciliation Of Claims, (B) Approving Additional Form Of Notice, and (C) Granting Related Relief* [ECF No. 12274] (the “ACR Order”). The ACR Order authorized the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Electric Power Authority (“PREPA”), and the Puerto Rico Public Buildings Authority

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567- LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK- 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

(“PBA,” and together with the Commonwealth, HTA, ERS, and PREPA, the “Debtors”) to resolve certain Pension/Retiree Claims, Tax Refund Claims, Public Employee Claims, and Grievance Claims (each as defined in the ACR Order) utilizing the Debtors’ existing administrative reconciliation processes (“Administrative Claims Reconciliation”).

2. Pursuant to the ACR Order, the Debtors hereby transfer the claims identified on Exhibit A hereto (the “Twelfth ACR Designated Claims”) into Administrative Claims Reconciliation. Each of the Twelfth ACR Designated Claims shall be resolved utilizing the Pension/Retiree Procedures, the Tax Refund Procedures, the Public Employee Procedures, and/or the Grievance Procedures (each as defined in the ACR Order), as applicable and as set forth on Exhibit A hereto.

3. As directed by the ACR Order, the Debtors shall serve a copy of the ACR Transfer Notice (as defined in the ACR Order) on each claimant whose claim is identified on Exhibit A hereto (the “Twelfth ACR Designated Claimants”).

4. Prime Clerk is hereby authorized and directed to designate the Twelfth ACR Designated Claims as “Subject to Administrative Reconciliation” on the Claims Registry in the Title III cases.

5. The Debtors shall serve copies of this notice upon the Twelfth ACR Designated Claimants listed on Exhibit A and the Master Service List (as defined by the *Fourteenth Amended Case Management Procedures* [Case No. 17-3283, ECF No. 15894-1]). This notice is also available on the Debtors’ case website at <https://cases.primeclerk.com/puertorico>.

Dated: May 4, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

Hermann D. Bauer

USDC No. 215205

Carla García Benítez

USDC No. 203708

O'NEILL & BORGES LLC

250 Muñoz Rivera Ave., Suite 800

San Juan, PR 00918-1813

Tel: (787) 764-8181

Fax: (787) 753-8944

*Attorneys for the Financial Oversight and
Management Board for Puerto Rico, as
representative for the Commonwealth of
Puerto Rico, Puerto Rico Highways and
Transportation Authority, Employees
Retirement System of the Government of the
Commonwealth of Puerto Rico, Puerto Rico
Electric Power Authority, and Puerto Rico
Public Buildings Authority*

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)

Brian S. Rosen (*pro hac vice*)

PROSKAUER ROSE LLP

Eleven Times Square

New York, NY 10036

Tel: (212) 969-3000

Fax: (212) 969-2900

*Co-Attorneys for the Financial Oversight
and Management Board for the Puerto Rico,
as representative for the Commonwealth of
Puerto Rico, Puerto Rico Highways and
Transportation Authority, Employees
Retirement System of the Government of the
Commonwealth of Puerto Rico, Puerto Rico
Electric Power Authority, and Puerto Rico
Public Buildings Authority*

Exhibit A

Claim Number	Creditor Name	ACR Procedures	Total Filed
31415	SOTO ACEVEDO, LUIS	Public Employee Claims	\$ -
31592	RIVERA VELASQUEZ, CANDIDA LUZ	Public Employee Claims	\$ -
31595	AULET BERRIOS, MARTIN	Public Employee Claims	\$ -
31634	AULET BERRIOS, MARTIN	Public Employee Claims	\$ -
31788	TORRES JUARBE, GLORIA M.	Public Employee Claims	\$ 7,093.77
31895	ORTIZ ROMERO, PEDRO	Public Employee Claims	\$ 14,558.23
31959	MANGOMA SENATI, VICTOR M.	Public Employee Claims	\$ 11,000.00
32035	PACHECO PADILLA, MARIBEL	Pension/Retiree Claims	\$ 67,797.04
32429	GONZALEZ PEREZ, MYRTHA I	Public Employee Claims	\$ -
32607	DELVALLE FERNANDEZ, JUAN ANTONIO	Public Employee Claims	\$ 44,995.00
32621	RIVERA MATEO, PEDRO IVAN	Public Employee Claims	\$ 5,400.00
32747	SOSTRE LACOT, WANDA I	Public Employee Claims	\$ 254.31
33035	COLON VALENTIN, SALVADOR	Public Employee Claims	\$ -
33058	RIVERA RIVERA, YARISSA I	Public Employee Claims	\$ 8,400.00
33136	BERCOVITCH, DENISE H	Public Employee Claims	\$ 53.09
33200	CHAVEZ QUIROGA, AMPARO	Public Employee Claims	\$ 110,000.00
33278	ALEQUIN RIVERA, CARLOS	Public Employee Claims	\$ 14,000.00
33464	RAMOS TORRES, EVELYN N	Public Employee Claims	\$ -
33499	MERCADO ROSA, HOMAT	Public Employee Claims	\$ 12,000.00
33637	SANTOS GARCIA, JUAN A	Public Employee Claims	\$ -
33642	VELEZ VELEZ, JEANNETTE YAHAIRA	Public Employee Claims	\$ -
33710	CARABALLO RAMIREZ, MARTA	Public Employee Claims	\$ 4,608.00
33914	MERCADO PADILLA, ISABEL	Public Employee Claims	\$ 16,800.00
34028	RAMOS CUEBAS, NORMA M	Public Employee Claims	\$ -
34048	COLON TORRES, ANDREA	Public Employee Claims	\$ 24,480.00
34064	ZARAGOZA GONZALEZ, EFRAIN	Public Employee Claims	\$ 45,000.00
34264	CARABALLO RAMIREZ, DANIEL	Public Employee Claims	\$ 14,322.00
34501	COLON VELAZQUEZ, NIVIA	Public Employee Claims	\$ 3,000.00

Exhibit A

Schedule of Twelfth ACR Designated Claims

Exhibit. 2021-ZZ56

SRF 53455

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)¹

ADMINISTRATIVE CLAIMS RECONCILIATION NOTICE

Service Date: **May 7, 2021**

Designated Claimant(s): **ORTIZ ROMERO, PEDRO**

Address: **PO BOX 190987**

SAN JUAN PR 00918-0987

Designated Claim Number(s): **31895**

Amount(s) Stated in Proof(s) of Claim: **\$14,558.23**

Claim Type: **Public Employee Claims**

This Notice only applies to the Designated Claim Number(s) listed above. You should read the Notice carefully and discuss it with your attorney. If you do not have an attorney, you may wish to consult one.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

If you have any questions, please contact Prime Clerk LLC at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).

By this Administrative Reconciliation Notice, **the Commonwealth of Puerto Rico** hereby submits the above- identified claim(s) (the “ACR Designated Claim(s)”) in **the Commonwealth of Puerto Rico’s** Title III case to resolution through administrative claims reconciliation, pursuant to the procedures (the “Administrative Reconciliation Procedures”) established by the *Order (A) Authorizing Administrative Reconciliation of Claims, (B) Approving Additional Form of Notice, and (C) Granting Related Relief*, entered by the United States District Court for the District of Puerto Rico (the “Title III Court”) on March 12, 2020 [ECF No. 12274-2]. Prime Clerk is hereby authorized and directed to designate the ACR Designated Claim(s) as “Subject to Administrative Reconciliation” on the Claims Registry in these Title III cases. A copy of the Administrative Reconciliation Procedures is enclosed for your reference.

The purpose of the Administrative Reconciliation Procedures is to allow the Commonwealth to evaluate and resolve your claim using its existing administrative processes. Only certain types of claims are eligible to participate in the Administrative Reconciliation Procedure: Claims for pension or retiree benefits (“Pension/Retiree Claims”), Claims for tax refunds (“Tax Refund Claims”), Claims for salaries and benefits owed to public employees (“Public Employee Claims”), and union grievances (“Grievance Claims”). For information regarding the administrative processes applicable to your claim, please see the attached “Overview of Administrative Claims Reconciliation Procedures.”

To ensure claims are resolved and paid in a timely fashion, the ACR Designated Claims will be monitored by the Title III court, and **the Commonwealth of Puerto Rico** will be required to inform the Title III court of the status of each ACR Designated claim submitted to the Administrative Reconciliation Procedures **every 60 days**.

You do not need to do anything further at this time. Within 60 days, a representative from the following agency will contact you and initiate the Administrative Reconciliation Procedure for your ACR Designated Claim:

Government Development Bank

If you do not hear from a Commonwealth agency representative within **SIXTY DAYS OF THE “SERVICE DATE” REFLECTED ON THE TOP OF THIS NOTICE, YOU MUST CONTACT PRIME CLERK.**

Prime Clerk LLC
Grand Central Station
PO Box 4850
New York, NY 10163-4850

Exhibit. 2021-ZZ57

FIRST-CLASS
US POSTAGE
PAID
PERMIT NO.1450
TOPPAN MERRILL

LEGAL NOTICE ENCLOSED. DIRECT TO ATTENTION OF ADDRESSEE OR PRESIDENT/GENERAL COUNSEL.

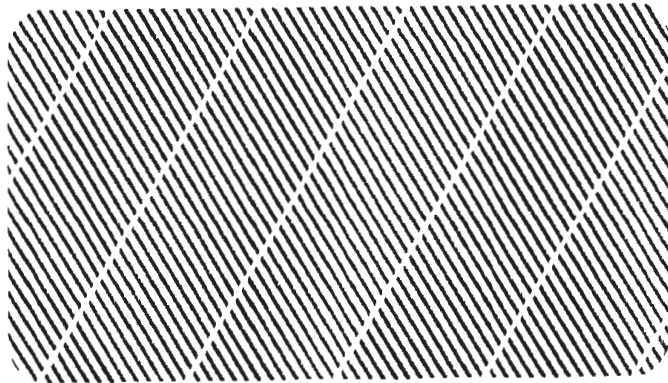


Exhibit. 2021-ZZ58



GOVERNMENT OF PUERTO RICO
PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY

July 8, 2021

ORTIZ ROMERO, PEDRO
PO BOX 190987
SAN JUAN PR 00918-0987

Re: Claim No. 31895 - REQUIRES RESPONSE

Dear **ORTIZ ROMERO, PEDRO**

Greetings on behalf of the Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF"). Under Act 2-2017, AAFAF represents the Government of Puerto Rico ("Government") in the Title III proceedings under PROMESA¹. You are receiving this communication because you filed the referenced Proof of Claim ("Claim") in the Title III Court.

As you know, the Debtors under Title III of PROMESA, through the Financial Oversight and Management Board ("FOMB") transferred your Claim to the Administrative Claims Resolution Process ("ACR") in order to resolve the Claim using the existing administrative procedures in the Government. The purpose of this letter is to notify that the information provided by you to date is not sufficient for the government entity you work for to adequately evaluate and resolve your Claim.

In consequence, we request that, within a term of twenty (20) days, you submit the attached form along with any supporting documentation in which you describe in detail the nature of your Claim. In your response, you should include, without limitation: (1) telephone number where you can be contacted; (2) employee number; (3) social security number; (4) if your claim is/has been subject of an administrative or judicial process, provide the case file number; and (5) any document that supports your Claim. If you have a pending administrative or judicial case, please so indicate. If, to the contrary, the case is closed, please provide a copy of the final resolution or final judgment, if available.

¹ Puerto Rico Oversight, Management, and Economic Stability Act.





GOVERNMENT OF PUERTO RICO
PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY

Please send the completed form and any supporting documents within twenty (20) days from the date of the notice of this letter, via email to PRACRprocess@primeclerk.com, or by mail, hand delivery, or overnight mail to the following address:

Commonwealth of Puerto Rico ACR Processing Center
c/o Prime Clerk, LLC
850 3rd Avenue, Suite 412
Brooklyn, NY 11232

It is of the utmost importance you reply to this letter within the twenty (20) days specified herein, for the adequate evaluation and resolution of your Claim. Should you have any questions regarding this letter, please write an email to acr@aafaf.pr.gov.

Respectfully,

The Puerto Rico Fiscal Agency
and Financial Advisory Authority

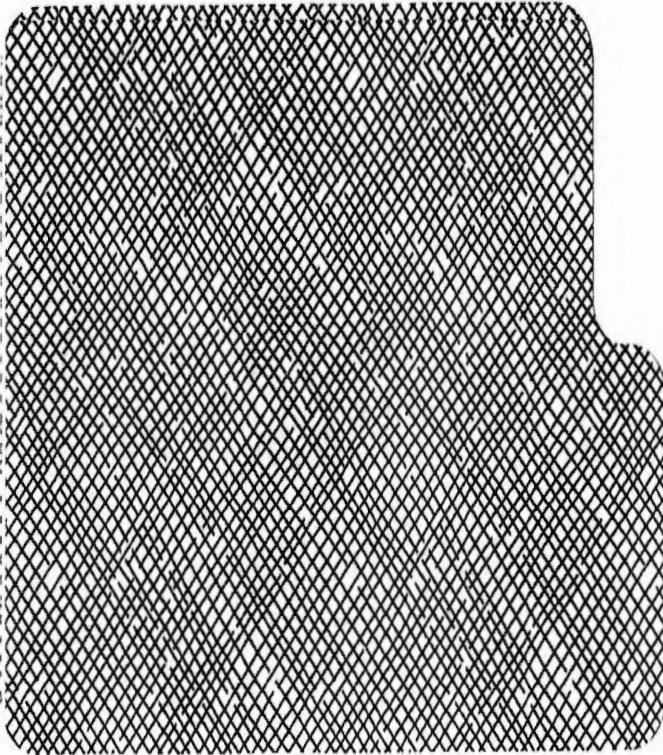


Exhibit. 2021-ZZ59

FIRST-CLASS MAIL
U.S. POSTAGE
PAID
PERMIT NO. 1450
TOPPAN MERRILL

0091980987 B009



United States Court of Appeals For the First Circuit

No. 19-2084

PEDRO ORTIZ-ROMERO,

Plaintiff - Appellant,

v.

GOVERNMENT DEVELOPMENT BANK FOR PUERTO RICO; CHRISTIAN SOBRINO-
VEGA; GUILLERMO CAMBA-CASAS,

Defendants - Appellees.

APPELLEES' BRIEFING NOTICE

Issued: July 14, 2021

Appellees' brief must be filed by **August 9, 2021**.

The deadline for filing appellant's reply brief will run from service of appellees' brief in accordance with Fed. R. App. P. 31 and 1st Cir. R. 31.0. Parties are advised that extensions of time are not normally allowed without timely motion for good cause shown.

Presently, it appears that this case may be ready for argument or submission at the coming **November, 2021** session.

The First Circuit Rulebook, which contains the Federal Rules of Appellate Procedure, First Circuit Local Rules and First Circuit Internal Operating Procedures, is available on the court's website at www.ca1.uscourts.gov. Please note that the court's website also contains tips on filing briefs, including a checklist of what your brief must contain.

Failure to file a brief in compliance with the federal and local rules will result in the issuance of an order directing the party to file a conforming brief and could result in the appellee not being heard at oral argument. See 1st Cir. R. 3 and 45.

Maria R. Hamilton, Clerk

UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

PRESS FIRMLY TO SEAL

PRESS FIRMLY TO SEAL



JUN 13, 22
AMOUNT
\$26.95
R2304M110938-12

**PRIORITY
★ MAIL ★
EXPRESS™**

OUR FASTEST SERVICE IN THE U.S.



**PRIORITY
MAIL
EXPRESS®**



EJ 759 891 448 US

CUSTOMER USE ONLY

FROM: (PLEASE PRINT) PHONE: (787) 457-3158

**PEDRO O. ROMERO
P.O. BOX 190987
SAN JUAN, PR. 00919-0987
Asunto: PROMSA TITULO III.**

DELIVERY OPTIONS (Customer Use Only)

☒ **SIGNATURE REQUIRED** (Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.)

☐ No Saturday Delivery (delivered next business day)
☐ Sunday/Holiday Delivery Required (additional fee, where available)
☐ 10:30 AM Delivery Required (additional fee, where available)
*Refer to USPS.com or local Post Office for details.

TO: (PLEASE PRINT) PHONE: (844) 822-9231
(646) 486-7944

**COMMONWEALTH OF PUERTO RICO
CLAIMS PROCESSING CENTER
C/O PRIME CLERK, LLC.
850 Third (3rd) AVENUE, SUITE 412
BROOKLYN, NY 11232**

ZIP + 4® (U.S. ADDRESSES ONLY)

WHEN USED INTERNATIONALLY,
A CUSTOMS DECLARATION
LABEL MAY BE REQUIRED.



July 2013 CD: 12 x 9.5



106 06

PEEL FROM THIS CORNER

VISIT US AT USPS.COM®
ORDER FREE SUPPLIES ONLINE

PAYMENT BY ACCOUNT (if applicable)

USPS® Corporate Acct. No. Federal Agency Acct. No. or Postal Service™ Acct. No.

ORIGIN (POSTAL SERVICE USE ONLY)

☒ 1-Day ☐ 2-Day ☐ Military ☐ DFO

PO ZIP Code 00918 Scheduled Delivery Date (MM/DD/YYYY) 6/14/22 Postage \$26.95

Date Accepted (MM/DD/YYYY) 6/13/22 Scheduled Delivery Time ☐ 10:30 AM ☐ 3:00 PM ☐ 12 NOON 6:00 Insurance Fee \$ COD Fee \$

Time Accepted 1:37 ☐ AM ☒ PM Return Receipt Fee \$ Live Animal Transportation Fee \$

Special Handling/Flag \$ Sunday/Holiday Premium Fee \$ Total Postage & Fees \$26.95

Weight 1.09 lbs Flat Rate \$ Acceptance Employee Initials SVP

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature

Delivery Attempt (MM/DD/YYYY) Time ☐ AM ☐ PM Employee Signature



**UNITED STATES
POSTAL SERVICE®**

This packaging is the property of the U.S. Postal Service® and is provided solely for use in sending Priority Mail Express™ shipments. It is not to be resold, reused, or otherwise disposed of. All rights reserved. © U.S. Postal Service, July 2013.